

ESTTA Tracking number: **ESTTA462938**

Filing date: **03/21/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92046185
Party	Plaintiff Amanda Blackhorse, Marcus Briggs, Phillip Gover, Shquanebin Lone-Bentley, Jillian Pappan, and Courtney Tsotigh
Correspondence Address	JESSE WITTEN DRINKER BIDDLE AND REATH LLP 1500 K STREET NW, SUITE 1100 WASHINGTON, DC 20005-1209 UNITED STATES Jesse.Witten@dbr.com, John.Ferman@dbr.com, Lee.Roach@dbr.com, Stephen.Wallace@dbr.com
Submission	Other Motions/Papers
Filer's Name	Jesse A. Witten
Filer's e-mail	Jesse.Witten@dbr.com, robertraskopf@quinnemanuel.com, toddanten@quinnemanuel.com, claudiabogdanos@quinnemanuel.com, dctrademarks@dbr.com
Signature	/Jesse A. Witten/
Date	03/21/2012
Attachments	Notice of Deposition - Tsotigh transcript.pdf ( 175 pages )(694986 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Registration No. 1,606,810 (REDSKINETTES)  
Registered July 17, 1990,

Registration No. 1,085,092 (REDSKINS)  
Registered February 7, 1978,

Registration No. 987,127 (THE REDSKINS & DESIGN)  
Registered June 25, 1974,

Registration No. 986,668 (WASHINGTON REDSKINS & DESIGN)  
Registered June 18, 1974,

Registration No. 978,824 (WASHINGTON REDSKINS)  
Registered February 12, 1974,

and Registration No. 836,122 (THE REDSKINS—STYLIZED LETTERS)  
Registered September 26, 1967

Amanda Blackhorse, Marcus Briggs,	)	
Phillip Gover, Jillian Papan, and	)	
Courtney Tsotigh,	)	
	)	
Petitioners,	)	
	)	
v.	)	Cancellation No. 92/046,185
	)	
Pro-Football, Inc.,	)	
	)	
	)	
Registrant.	)	
_____	)	

**PETITIONERS' NOTICE OF FILING OF DEPOSITION OF COURTNEY TSOTIGH**

PLEASE TAKE NOTICE that Petitioners Amanda Blackhorse, Marcus Briggs-Cloud, Phillip Gover, Jillian Pappan, and Courtney Tsotigh hereby file the transcript of the deposition of Courtney Tsotigh along with the exhibits used at the deposition.

On March 14, 2011, Petitioners and Registrant Pro-Football, Inc. filed a Joint Stipulation Regarding Admissibility of Certain Evidence and Regarding Certain Discovery Issues [Docket No. 31], which, among other things, provided that depositions of Petitioners taken during the discovery period shall be admissible to the same extent as if taken during the testimony period. The Board commended the parties for reaching the stipulation. *See* Order Summarizing Pre-Trial Conference of May 5, 2011 [Docket No. 39] at 4-5.

Pursuant to the Joint Stipulation, Registrant took the deposition of Courtney Tsotigh during the discovery period. Petitioners are filing the entire transcript and all deposition exhibits out of an abundance of caution in light of 37 CFR § 2.125, which calls for the filing of an entire transcript and all exhibits of a deposition taken during the testimonial period. Certain portions of the deposition, which will be cited in Petitioners' trial brief, are relevant to show that Petitioner Courtney Tsotigh has standing under 15 U.S.C. § 1064 and to address Registrant's affirmative defense of laches. However, by filing the entire transcript and all deposition exhibits, Petitioners do not concede that material that is not cited in their trial brief is admissible and relevant.

Respectfully Submitted,

Dated: March 21, 2012

/Jesse A. Witten/  
Jesse A. Witten  
Jeffrey J. Lopez  
John D. V. Ferman  
Lee Roach  
Stephen J. Wallace  
DRINKER, BIDDLE & REATH, LLP  
1500 K Street, N.W., Suite 1100  
Washington, D.C. 20005  
Telephone: (202) 842-8800  
Fax: (202) 842-8465  
Email: [Jesse.Witten@dbr.com](mailto:Jesse.Witten@dbr.com)

*Counsel for Petitioners*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 21, 2012, he caused a copy of the foregoing Petitioners' Notice of Filing of Deposition of Courtney Tsotigh and the Attachment to Petitioners' Notice of Filing of Deposition of Courtney Tsotigh to be served via Federal Express upon the following:

Robert Raskopf  
Claudia T. Bogdanos  
Todd Anten  
QUINN EMANUEL URQUHART & SULLIVAN, LLP  
51 Madison Avenue, 22<sup>nd</sup> floor  
New York, NY 10010

/Jesse A. Witten/

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Registration No. 1,606,810 (REDSKINETTES)  
Registered July 17, 1990,

Registration No. 1,085,092 (REDSKINS)  
Registered February 7, 1978,

Registration No. 987,127 (THE REDSKINS & DESIGN)  
Registered June 25, 1974,

Registration No. 986,668 (WASHINGTON REDSKINS & DESIGN)  
Registered June 18, 1974,

Registration No. 978,824 (WASHINGTON REDSKINS)  
Registered February 12, 1974,

and Registration No. 836,122 (THE REDSKINS—STYLIZED LETTERS)  
Registered September 26, 1967

Amanda Blackhorse, Marcus Briggs,  
Phillip Gover, Jillian Papan, and  
Courtney Tsotigh,

Petitioners,

v.

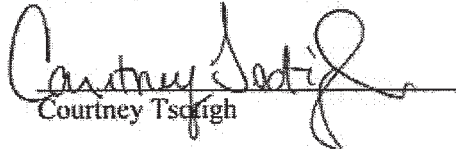
Pro-Football, Inc.,

Registrant.

Cancellation No. 92/046,185

**DEPOSITION ERRATA – COURTNEY TSOTIGH**

I, Courtney Tsotigh, the witness in a deposition taken in the above action on October 25, 2011, submit the attached corrections to the transcript of that deposition. The attached document reflects the changes, errors and corrections that I noted with respect to the transcript.

  
Courtney Tsotigh

Dated: November 28, 2011

# ERRATA SHEET – COURTNEY TSOTIGH (OCTOBER 25, 2011)

PAGE	LINE	FROM	TO	REASON
14	19	"I think we kept it, I think I kept it."	"I think my parents kept it."	Clarification.
130	23-25	"How he's using it's not offensive, he's talking about an offensive line in a game, I don't know."	"How he's using it's not offensive, he's talking about an offensive line in a game, I don't know. He may have been trying to make a joke, but I think it is offensive to use that word."	Clarification.
131	6-7	"I don't know the context that they're using it in."	"I don't know the context that they're using it in, but it is offensive to refer to Native Americans as 'skins,' even when no harm is intended."	Clarification.
143	21	"Yes."	"In 2006, when the petition was filed, he would have been 16 years old, too young for this."	Clarification.

1           IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
2           BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

3  
4       ----- )  
      AMANDA BLACKHORSE, MARCUS BRIGGS, )  
5       PHILLIP GOVER, SHQUANEBIN        )  
      LONE-BENTLEY, JILLIAN PAPPAN, AND )  
6       COURTNEY TSOTIGH,                 )  
  )  
7               Petitioners,                )  
  )  
8    )Cancellation  
      vs.                                    )No. 92/0467,185  
9    )  
      PRO-FOOTBALL, INC.,                 )  
10    )  
  )  
              Registrant.                 )

11       -----  
      (Caption continues on next page)

12  
13  
14               DEPOSITION OF COURTNEY TSOTIGH  
15               TAKEN ON BEHALF OF THE REGISTRANT  
16               IN OKLAHOMA CITY, OKLAHOMA  
17               ON OCTOBER 25, 2011

18  
19               REPORTED BY: KAREN B. JOHNSON, CSR  
20  
21  
22  
23  
24  
25

1 (Caption continued from previous page)  
 2 ----- )  
 3 In Re: Registration No. 1,606,810 (REDSKINETTES) )  
 4 Registered July 17, 1990; )  
 5 Registration No. 1,085,092 (REDSKINS) )  
 6 Registered February 7, 1978; )  
 7 Registration No. 987,127 (THE REDSKINS & DESIGN) )  
 8 Registered June 25, 1974, )  
 9 Registration No. 986,668 (WASHINGTON REDSKINS & )  
 10 DESIGN) )  
 11 Registered June 18, 1974, )  
 12 Registration No. 978,824 (WASHINGTON REDSKINS) )  
 13 Registered February 12, 1974; )  
 14 And Registration No. 836,122 (THE REDSKINS-STYLIZED  
 15 LETTERS), Registered September 26, 1967, )  
 16 -----

17  
18  
19  
20  
21  
22  
23  
24  
25



A P P E A R A N C E S

For the Petitioners:

Stephen J. Wallace  
Drinker, Biddle & Reath, LLP  
1500 K Street, N.W.  
Washington, D.C. 20005-1209  
(202)230-5670

For the Registrant:

Robert L. Raskopf  
Todd Anten  
Quinn, Emanuel, Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Floor  
New York, New York 10010  
(212)849-7000

I N D E X

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page

Direct Examination by Mr. Raskopf	6
Cross-Examination by Mr. Wallace	146

TSOTIGH EXHIBITS

Page

Number 1	Copy of Tribal ID Card	7
Number 2	E-mail	87
Number 3	Response to Request for Production	101
Number 4	Response to Second Request	102
Number 5	Response to Interrogatories	102
Number 6	Tulsa Union Website Printout	113
Number 7	Daily Oklahoman Article	133
Number 8	E-mail	141

\* \* \* \* \*

S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by and among the attorneys for the respective parties hereto that the deposition of COURTNEY TSOTIGH may be taken on behalf of the Registrant on the 25th of OCTOBER, 2011, in OKLAHOMA CITY, OKLAHOMA, by Karen Johnson, Certified Shorthand Reporter for the State of Oklahoma, taken pursuant to Federal Rules of Civil Procedure.

\* \* \* \* \*

1 COURTNEY TSOTIGH,  
2 after having been first duly sworn at 9:25 a.m.  
3 deposes and says in reply to the questions  
4 propounded as follows, to wit:

5 DIRECT EXAMINATION

6 BY MR. RASKOPF:

7 Q Good morning, Ms. Tsotigh, my name is  
8 Robert Raskopf, I represent Pro-Football, Inc.,  
9 which owns the Washington Redskins trademarks, and  
10 you're at a deposition, and I guess my first  
11 question to you is whether you've ever given a  
12 deposition before?

13 A No.

14 Q Have you ever testified in a proceeding  
15 under oath before?

16 A No.

17 Q Have you ever been involved in a lawsuit  
18 before?

19 A No.

20 Q Have you ever been a witness in a lawsuit  
21 in which you were not personally involved before?

22 A No.

23 Q So is it fair to say this is your first  
24 foray into the world of sworn testimony in a  
25 litigation?

1           A     Fair.

2           Q     And accurate; correct?

3           A     Yes.

4           Q     All right. And, now, your counsel just  
5 handed me a document that is a photocopy, appears to  
6 be a photocopy of a tribal identification card, we  
7 can mark it for identification.

8                   (Exhibit Tsotigh Number 1 marked for  
9 identification and made part of the  
10 record)

11           MR. RASKOPF: This document is not Bates  
12 stamped, maybe we can deem it Bates stamped the next  
13 succeeding Bates stamp number for you guys.

14           MR. WALLACE: Sure.

15           MR. RASKOPF: Maybe you can substitute a  
16 Bates stamp for this as we move down the road  
17 together.

18           MR. WALLACE: That would be fine.

19           MR. RASKOPF: Fantastic. Do you have an  
20 extra copy for Mrs. Tsotigh?

21           MR. WALLACE: I do.

22           Q     (By Mr. Raskopf) I want to show you this  
23 document, Ms. Tsotigh, and is it what I said it was?

24           A     Yes.

25           Q     Okay. Now, this says you're an enrolled

1 member of the Kiowa Tribe of Oklahoma?

2 A The Kiowa Tribe of Oklahoma.

3 Q Kiowa. So I got the pronunciation wrong,  
4 it's Kiowa Tribe?

5 A Yes.

6 Q You are a member of the Kiowa Tribe?

7 A Yes.

8 Q What are your bloodlines that give you the  
9 right to be a member of the tribe?

10 A I'm a half degree of Kiowa.

11 Q Half degree of Kiowa, so that means you --

12 A My father is a Kiowa descendent.

13 Q Does your mom have Native American blood,  
14 also?

15 A No.

16 Q So you're 50/50?

17 A Yes.

18 Q What's your mom's 50 consist of?

19 A She is European, white.

20 Q Okay. But is she German?

21 A No.

22 Q French?

23 A I don't know much about her family.

24 Q Okay. And does the Kiowa Tribe support  
25 the claims that you've made in this petition?

1 MR. WALLACE: Objection.

2 THE WITNESS: I don't know.

3 Q (By Mr. Raskopf) By that you mean you  
4 don't know one way or the other, you don't know if  
5 this Kiowa Tribe support the claims that you had  
6 made in this petition against the Washington  
7 Redskins or if they don't support it?

8 A I don't know if they support my claims in  
9 the petition to the Washington Redskins.

10 Q So you haven't ever sought to obtain  
11 approval from the Kiowa Tribe to support the claims  
12 that you made in your petition?

13 A No.

14 Q You're a member of the Kiowa Tribe; right?

15 A Yes, sir.

16 Q Do you have a role in the tribe as an  
17 official of the tribe?

18 A No.

19 Q You know certain of the officials of the  
20 tribe, do you not?

21 A Yes.

22 Q You know their names for sure?

23 A Yes.

24 Q You know some of their names for sure?

25 A Yes.

1           Q     Because you put them in sworn testimony in  
2     this case when you sent us information about the  
3     Kiowa Tribe, who was the head of the Kiowa Tribe or  
4     whatever, you remember doing that?

5           A     Yes.

6           Q     Okay. So you know names of some people in  
7     the Kiowa Tribe, and you never bothered to ask them  
8     whether they would get the Kiowa Tribe to sign off  
9     on your claims in this case?

10          A     No.

11          Q     You didn't think that was appropriate?

12          A     Not -- I didn't not think it was  
13     appropriate. The Kiowa Tribe right now is -- or  
14     whenever I submitted the names of those in position  
15     were at a year where they were turning over  
16     leadership, and since then, their leadership has  
17     been recalled numerous times, so bringing about  
18     matters of this business is probably not something  
19     they could deal with at this time.

20          Q     Okay. So let's go back to 2006.

21          A     Right.

22          Q     That's when you filed your petition?

23          A     Right.

24          Q     Did you contact the Kiowa Tribe about  
25     getting their approval to endorse your claims with



1       respect to the Washington Redskins at that time?

2               MR. WALLACE:   Objection; asked and  
3       answered.

4               THE WITNESS:   No.

5               Q       (By Mr. Raskopf)   They weren't in  
6       transition or whatever at that point in time; right?  
7       They had a membership hierarchy that was in place;  
8       correct?

9               A       Uh-huh, yes.

10              Q       Have you spoken to any members of the  
11       Kiowa Tribe about your petition?

12              A       Yes.

13              Q       Okay.   And who would that be, other than  
14       perhaps your father?

15              A       My uncle, Jacob Tsotigh.   That's all I can  
16       think of.

17              Q       All right.   So you've spoken to your  
18       father about this; right?

19              A       Yes.

20              Q       But no one else, to your knowledge, who is  
21       a member of the Kiowa Tribe have you spoken to about  
22       your petition and your views in the case?

23              A       Not that I can remember.

24              Q       If you had heard that the Kiowa Tribe  
25       itself does not support the views of your petition,

1 would that have any effect on your decision whether  
2 or not you would file against the Redskins?

3 A No.

4 Q That's because you're here today only in  
5 your personal capacity?

6 A Yes, sir.

7 Q And you're not trying to demonstrate that  
8 you're representing any group or group of  
9 individuals or whatever, other than yourself, in  
10 connection with this claim that you're making;  
11 right?

12 A Yes, I'm only here to represent myself.

13 Q Okay. And have you ever seen any  
14 information at all that suggested that your own  
15 views about the Washington Redskins trademarks are  
16 rejected by most Native Americans?

17 A Can you --

18 Q She'll read it back.

19 A -- read it back?

20 COURT REPORTER: "And have you ever seen  
21 any information at all that suggested that your own  
22 views about the Washington Redskins trademarks are  
23 rejected by most Native Americans?"

24 THE WITNESS: Yes.

25 Q (By Mr. Raskopf) Okay. And what

1 information have you seen that suggests that?

2 A I believe that I can recall maybe a  
3 newspaper article that cited a survey that was  
4 taken, I think that's all I can really recall.

5 Q That's all you remember?

6 A Yes.

7 Q So there's one article that discussed the  
8 survey that you read that indicated that your views  
9 were rejected by most Native Americans; right?

10 A Right.

11 Q Did you produce that article in this case?

12 A No, because I can only remember it because  
13 it's only been within the last couple weeks that I  
14 can specifically remember that article, with any --  
15 that -- of the case, or that of the -- of Native  
16 Americans being -- rejecting this claim.

17 Q Okay. Now, so where were you physically  
18 located when you saw this article?

19 A At my parents' house.

20 Q Okay. And where do they reside?

21 A In Moore, Oklahoma.

22 Q Moore?

23 A Moore.

24 Q M-O-O-R-E?

25 A Uh-huh.

1 Q How far out of Oklahoma City is that?

2 A About 20 minutes.

3 Q Okay. By car?

4 A Yes, by car.

5 Q I'm from New York, we walk once in a  
6 while. And was it a magazine?

7 A It was a newspaper article produced by the  
8 Daily Oklahoman.

9 Q Okay. So it was a recent newspaper  
10 article?

11 A Yes.

12 Q And you don't have a copy of that here  
13 today?

14 A No.

15 Q Okay. Did you send it to -- did you make  
16 a copy of it?

17 A No.

18 Q So you just read it and that was it?

19 A I think we kept it, I think I kept it.

20 Q You kept it, okay. And so where is the  
21 article physically located right now?

22 A At my parents' house.

23 Q Okay. So you could go and get it if you  
24 wanted to?

25 A Possibly.

1           Q     Okay. So what was the newspaper article  
2 about?

3           A     It was -- I believe it was an article  
4 somebody had wrote in to the newspaper and they  
5 addressed it in the sports page about the use of  
6 mascots and just citing the offenses of it, of the  
7 use of Native Americans as mascots.

8           Q     But the article concludes or writes  
9 somewhere in there that this poll once showed that  
10 Native Americans don't really agree with the claim  
11 that this is something wrong with these mascots;  
12 right?

13          A     Yes.

14          Q     Okay. And --

15          A     But then they, themselves, did not take  
16 that poll, it was a poll that was taken from another  
17 source that they had found somewhere in the World  
18 Wide Web.

19          Q     Sure. Well, have you seen the results of  
20 polls that show that Native Americans generally  
21 don't support the petition?

22          A     Firsthand, no.

23          Q     What do you mean firsthand, so I  
24 understand what you're talking about? You mean you  
25 haven't actually read the result, you haven't

1 actually taken the data and added up the numbers  
2 yourself?

3 A Right, I haven't done that myself.

4 Q Have you seen a report that was --

5 A Yes, in different places, different times.

6 Q And do you have any reason to believe that  
7 the results of those polls were fabricated?

8 A I question whether they were fabricated, I  
9 question who represents those, who the poll is  
10 sampling to get their numbers and to deem them  
11 accurate as representing Native Americans. So I  
12 question those things.

13 Q Well, have you done anything about that,  
14 have you asked the poll takers in question to  
15 disclose precisely how their data was obtained?

16 A No.

17 Q Okay. So you had a question, but you  
18 didn't search for an answer; right?

19 A No.

20 Q Okay. Now, what was the name of the  
21 newspaper that you saw?

22 A The Daily Oklahoman.

23 Q Okay. That's the daily newspaper in --

24 A Oklahoma.

25 Q Oklahoma, okay. What was the date of the

1 article, of this article?

2 A I don't remember.

3 Q So what was the day you were at your  
4 parents' house, was it a weekend or a weekday?

5 A A weekday.

6 Q Weekday, okay. And so it was in the last  
7 couple weeks?

8 A Yeah, couple weeks, two to three weeks.

9 Q Okay. So, and was it the newspaper from  
10 the day -- from the day before or of that day?

11 A I don't remember.

12 Q Well, you've been to your parents' house a  
13 bunch of times; right?

14 A Right.

15 Q They throw out the daily newspaper usually  
16 every day at the end of the day or the beginning of  
17 the next day or they save them?

18 A My parents?

19 Q Yeah.

20 A They probably save them.

21 Q They just save them, okay.

22 A I wouldn't say save them, they hoard them.

23 Q I know what that means. Okay. And so all  
24 you know is that it's a newspaper that -- was it on  
25 the coffee table or is it in a stack of newspapers

1     that looked like the hoard as opposed to one of the  
2     latest ones?

3           A     It was probably on the kitchen table.

4           Q     Okay.

5           A     At my parents' house.

6           Q     You walked in to have breakfast and there  
7     was the Oklahoman on the table?

8           A     Probably had lunch, but, yes.

9           Q     You picked it up and read it?

10          A     Uh-huh.

11          Q     Okay. How long ago did you obtain your  
12     tribal identification card?

13          A     Since I lost it? Or since it was issued  
14     to me originally?

15          Q     When was the first time it was issued to  
16     you?

17          A     Whenever I was a baby, an infant.

18          Q     So -- well, you didn't apply for it,  
19     someone in your family applied for it for you?

20          A     Right.

21          Q     You remember having one of these before?

22          A     All my life.

23                   MR. WALLACE: Objection.

24          Q     (By Mr. Raskopf) Okay. You had one, then  
25     you lost it, or have you lost your card a couple of



1 times?

2 A I've lost my card a couple of times.

3 Q Okay. This has an issue date of July 25,  
4 2011, on it?

5 A Uh-huh.

6 Q This is referring to Tsotigh Exhibit 1, so  
7 that's the date this particular card was issued.  
8 How would I know that this is a replacement card as  
9 opposed to the first time you ever got a card?

10 MR. WALLACE: Objection.

11 THE WITNESS: Because it has the issue  
12 date on it.

13 Q (By Mr. Raskopf) Yeah, the issue date is  
14 July 25, 2011; right?

15 A Yes.

16 Q So that means, as far as I know, you were  
17 issued a tribal identification card this July for  
18 the first time?

19 MR. WALLACE: Objection.

20 THE WITNESS: No.

21 Q (By Mr. Raskopf) Okay. So that's what  
22 I'm asking, how do I know that this is not a card,  
23 other than by you telling me, which is fine, too,  
24 but I just want to know that, is there anything on  
25 the card that says that you -- that this replaces an

1 earlier card that was issued on an earlier occasion?

2 A Not on the card.

3 Q Okay. Who applied for this --

4 A I did.

5 Q -- particular card?

6 A This particular card, I did.

7 Q Okay. When did you submit your  
8 application?

9 A For this particular card?

10 Q Yeah.

11 A Probably that day.

12 Q It gets issued in one day?

13 A Yes, because I show that I am a member of  
14 the tribe on their enrollment, so issuing a card for  
15 tribal identification is like issuing a license.

16 Q Okay. So what did you show them to show  
17 you were a member?

18 A I didn't have to -- I showed them probably  
19 my state ID to show -- verify that it was myself,  
20 but they have my roll number, my enrollment number  
21 identifies me as being a member of the tribe, so I'm  
22 authorized to have this card.

23 Q So your enrollment number is on file,  
24 you're saying?

25 A Yes.

1 Q It was already on file?

2 A Uh-huh.

3 Q So you went and presented this personally?

4 MR. WALLACE: Objection.

5 THE WITNESS: I called and I picked it up  
6 personally.

7 Q (By Mr. Raskopf) Okay. So you say you  
8 need a replacement card, here's who I am, I'll be  
9 down to pick it up?

10 A Yeah.

11 Q Where did you go to pick it up?

12 A Carnegie, Oklahoma.

13 Q Okay. And you remember doing this on July  
14 25th or thereabouts?

15 A Thereabouts.

16 MR. WALLACE: Objection. Give me time to  
17 object.

18 THE WITNESS: Okay.

19 Q (By Mr. Raskopf) So did you meet with  
20 anyone before giving your testimony today concerning  
21 this deposition?

22 A Yes.

23 Q With whom did you meet?

24 A Stephen.

25 Q The guy sitting to your left?

1           A     Right.

2           Q     And how long did you meet with him?

3           A     About a hour.

4           Q     Was it today or yesterday?

5           A     Yesterday.

6           Q     At this law firm?

7           A     No.

8           Q     Somewhere else?

9           A     Yes.

10          Q     Where?

11          A     At a hotel.

12          Q     Okay. And did anything that you discussed  
13 with him refresh your recollection about any of the  
14 matters in question in the petition?

15          A     Yes.

16          Q     Okay. And what thing, how was your  
17 recollection refreshed?

18          A     By dates.

19          Q     Okay. So there were some dates that you  
20 now remember that you didn't remember before  
21 yesterday?

22          A     Yes.

23          Q     Could you give me an example?

24          A     For example, I remember that we filed the  
25 petition in August 2006, but the exact date was -- I

1 was -- my memory was refreshed.

2 Q You remember that you were -- you turned  
3 18 before the petition was filed?

4 A Yes, I already knew that.

5 Q And there was a period of about 11 months  
6 and 20 days between the time that you turned 18 and  
7 the time that the petition was filed?

8 MR. WALLACE: Objection.

9 THE WITNESS: About 11 months, I don't  
10 know, I turned -- my birthday's August 22nd.

11 Q (By Mr. Raskopf) Right. The petition was  
12 filed on what?

13 A August 11th.

14 Q Okay. So pretty close to that; right? A  
15 little less than a year?

16 A Right.

17 Q And more than 11 months?

18 A Right.

19 Q And how long before you filed the petition  
20 did you know about the Washington Redskins?

21 A Since probably about -- well, I've known  
22 about the Washington Redskins for quite some time.

23 Q I bet. And so are you an NFL fan?

24 A (Shakes head) .

25 Q Football fan in general, though?

1           A       (Nods head) .

2                   MR. WALLACE:   Make sure you answer out  
3   loud.

4           Q       (By Mr. Raskopf) She nodded yes when I  
5   asked her if she was an NFL fan; right?

6           A       No, I'm not --

7           Q       I'm sorry, a football fan?

8           A       Not really a NFL fan; yes, I'm a football  
9   fan.

10          Q       Okay.

11          A       How long have I known about the Washington  
12   Redskins, for a long time, yeah.

13          Q       Is your father a football fan?

14          A       Yes.

15          Q       Is he an NFL fan?

16          A       Yes.

17          Q       He's got a favorite team?

18          A       I guess.

19          Q       I'm thinking the Chiefs, is he a fan of  
20   the Chiefs?

21          A       No.

22          Q       What's -- you don't know what his favorite  
23   team is?

24          A       He's not a fan of the Chiefs.

25          Q       All right.

1           A       He likes the Dallas Cowboys, the Minnesota  
2 Vikings, well, I would say he likes a player on the  
3 Vikings, not the Minnesota Vikings, but don't we  
4 all?

5           Q       Okay.

6           A       That's about all I know.

7           Q       That's fine. And you lived at home with  
8 your parents until you were how old?

9           A       Until I was 18 years old.

10          Q       So there had to have been times when your  
11 father was watching NFL on TV during those years?

12          A       Probably.

13          Q       All right. And do you remember watching  
14 any games with him?

15          A       No.

16          Q       Not ever?

17          A       No, he watches TV in his bedroom.

18          Q       So you never went into his bedroom and  
19 watched TV with him?

20          A       No.

21          Q       He doesn't make you come in and watch TV  
22 with him, watch a football game with him?

23          A       No.

24          Q       He never did that?

25          A       Not that I can remember.

1           Q     Is there a TV not just in the bedroom, but  
2     also elsewhere in the house?

3           A     Yes.

4           Q     He never watches football on that TV?

5           A     No.

6           Q     Does your mother have a rule that he's not  
7     allowed to watch football in the house, other than  
8     in his room?

9           A     No, he prefers to watch TV in his bedroom.

10          Q     Has he ever expressed to you the reason  
11     for that?

12                 MR. WALLACE:  Objection; relevance.

13                 THE WITNESS:  It's just the type of man he  
14     is, I don't know, he's always been like that my  
15     whole life.  He has four kids, he probably spares us  
16     watching TV with him.  Lets us watch our own TV.

17          Q     (By Mr. Raskopf)  So what about when you  
18     were outside of the house, you've never gone to a  
19     bar and seen NFL games on?

20          A     No.

21          Q     Or a --

22          A     Well, I don't say no, there's probably  
23     been a time, I haven't been in a bar, maybe there's  
24     been TV on, football on, NFL games on, but I don't  
25     take myself out of my house to a public place to



1 watch football, NFL football, I guess.

2 Q Well, in college, does your college have a  
3 football team?

4 A Yes.

5 Q So you would go and watch their games or  
6 not?

7 A No.

8 Q So when you said you were a fan of  
9 football earlier --

10 A Yes.

11 Q -- exactly how do you enjoy your fandom?

12 MR. WALLACE: Objection; vague.

13 THE WITNESS: How do I enjoy my what,  
14 my --

15 Q (By Mr. Raskopf) How do you act upon  
16 being a fan of football?

17 A I sometimes watch it, I sometimes listen  
18 to it on the radio, I catch the highlights on ESPN  
19 or on my local news station.

20 Q Okay. Have you ever watched ESPN, like  
21 Sports Center or something, you're seeing highlights  
22 of all kinds of sports; right?

23 A Right.

24 Q Including NFL?

25 A Yeah.

1           Q       When for the first time do you definitely  
2 remember seeing the Washington Redskins playing  
3 football on a football field?

4           MR. WALLACE:   Objection; foundation.

5           THE WITNESS:   I think it was probably,  
6 trying to jog my memory way back, when my brother  
7 was watching his team, one of his teams and they  
8 were playing each other, and I remember they were  
9 playing each other, that's all I remember. And it  
10 was years back.

11          Q       (By Mr. Raskopf)   When you say they were  
12 playing each other, what do you mean?

13          A       His team, I think, which is the Minnesota  
14 Vikings, was playing the Washington Redskins.

15          Q       Okay.   So his team was playing and his  
16 favorite team, your brother's favorite team -- you  
17 got four -- you got three siblings?

18          A       Right.

19          Q       How many brothers, how many sisters?

20          A       Three brothers.

21          Q       Just like my daughter, three brothers.   So  
22 one of your other brothers is a Redskins fan?

23          A       No, he's a Vikings fan, I believe, if it  
24 hasn't changed.

25          Q       So he was watching the Vikings on TV?

1           A       And they were playing the Redskins.

2           Q       Okay. And when was this?

3           A       I was young, I was probably 11 years old  
4 maybe.

5           Q       Okay. And this was on TV in your house?

6           A       Yes.

7           Q       Not in your father's room?

8           A       Not in my father's room.

9           Q       In the middle, in the main part of the  
10 house?

11          A       In the main part, in the living room, main  
12 part of the house.

13          Q       So were your other brothers watching the  
14 game, too?

15          A       Probably not.

16          Q       And I'm going -- is your brother older  
17 than you or younger than you?

18          A       Older.

19          Q       How many years?

20          A       Eight years older.

21          Q       So he was 19 when he was watching the  
22 Redskins play the Vikes, if you were 11,  
23 thereabouts?

24          A       Yeah.

25          Q       Now, I'm going to assume that the topic of

1 whether Washington Redskins disparaged Native  
2 Americans never came up during this telecast of the  
3 game; right?

4 A No.

5 Q Right. This is probably not a big issue  
6 to your brother; right?

7 MR. WALLACE: Objection.

8 THE WITNESS: I don't know.

9 Q (By Mr. Raskopf) Yeah, you've never  
10 discussed it with him, have you?

11 A No.

12 Q Right. And what about your other  
13 brothers?

14 MR. WALLACE: Objection.

15 Q (By Mr. Raskopf) Are they older than you  
16 or younger than you?

17 A One's five years older than me and one is  
18 a twin.

19 Q Okay. And you haven't discussed the  
20 Washington Redskins petition with either of them,  
21 either, have you?

22 A Not that I can remember.

23 Q You already said that the only persons you  
24 ever spoke to about it were your father and your --  
25 an Uncle Jacob, I want to say?

1           A     Right.

2                   MR. WALLACE:  Objection.

3           Q     (By Mr. Raskopf)  So that would be  
4 consistent; right?  That you never spoke to even  
5 your brothers about this; right?

6           A     Right, not that I can remember  
7 specifically.

8           Q     Okay.  Just curious, why wouldn't you have  
9 wanted to know what your brothers thought about  
10 whether the designation Washington Redskins  
11 disparages Native Americans?

12          A     Not that I didn't want to know, it just  
13 didn't come up in a conversation together.

14          Q     Well, they've got to know you filed this  
15 petition, don't they?

16          A     Yes.

17          Q     Okay.  But you still never discussed it  
18 with them?

19          A     No.

20          Q     So they've never come to you and expressed  
21 their views of your filing this petition and whether  
22 they supported your beliefs or not; right?

23          A     No.

24          Q     Are your other brothers NFL fans?

25                   MR. WALLACE:  Objection.

1                   THE WITNESS: One I know probably for sure  
2 is, the other two are probably indifferent to it.

3           Q        (By Mr. Raskopf) Is it -- your twin  
4 brother is a fan or not?

5           A        What do you mean by fan?

6           Q        Follows -- you don't know what I mean by  
7 fan?

8           A        Follows them like follows them?

9           Q        Yeah, follows the team, sees how they've  
10 been doing, maybe watches them when he can?

11          A        No. I don't think so.

12          Q        So none of your brothers, other than your  
13 oldest brother --

14          A        They don't follow a team, they're more  
15 college football fans.

16          Q        Let me just finish my question. I just  
17 want to be sure we're on the same page. So none of  
18 your brothers, other than your oldest brother, is  
19 really a fan of a particular NFL team; is that  
20 right?

21          A        Right.

22          Q        And what college teams do they follow;  
23 your other brothers?

24          A        OU, and my middle brother, I think he just  
25 likes college football, I don't think he has like a

1 team, maybe if he did, OSU.

2 Q Okay. Are they also enrolled members in  
3 the Kiowa Tribe?

4 A Kiowa Tribe.

5 Q Kiowa Tribe, I messed that up, Kiowa  
6 Tribe.

7 A Yes, they are.

8 Q So when did you first learn about the idea  
9 of getting into this case?

10 A The case?

11 Q Your case.

12 A Would have probably been in 2006.

13 Q And how did -- what was the first  
14 circumstance that you recall?

15 A Well, I had been aware of this for -- of  
16 the -- not necessarily the case, I guess, the issue  
17 at hand, I've been aware of it, I had been aware of  
18 it prior to 2006 for quite some time, and really  
19 reflecting back, probably 2003, 2004, I learned  
20 about the actual case in probably 2004, 2005, and  
21 then learned more, even more about it in 2006.

22 Q But how -- who suggested that you  
23 participate in the case?

24 MR. WALLACE: Objection.

25 THE WITNESS: I guess it would have been

1 a -- maybe a mentor of mine who was -- who I sat on  
2 a commission with had made me aware that this was a  
3 case, and she --

4 Q (By Mr. Raskopf) What was her name?

5 A Suanne Ware.

6 Q Okay. You say you became aware of the  
7 case in 2004, 2005, you're not talking about your  
8 case?

9 A Not my case, yeah.

10 Q What case are you talking about?

11 A The case that had went in prior to this.

12 Q You're talking about the Harjo case?

13 A Yes.

14 Q So you became aware of the Harjo case in  
15 2004 or 2005?

16 A Yes.

17 Q So you said you became aware of the issue  
18 in 2003 to 2004?

19 A I wouldn't -- I would say -- with like the  
20 Redskins?

21 Q Right.

22 A Yes, in 2003, 2004.

23 Q How did you become aware of the Redskins  
24 issue in 2003 to 2004?

25 A By reading material, reading different



1 things, that was mostly it.

2 Q All right. So 2003, you were about 16  
3 years old?

4 A Yes.

5 Q Okay. So before you were 16, you didn't  
6 have an awareness of this -- of this issue; correct?

7 A Yes, I did.

8 Q You did?

9 A I did. I mean, I had -- I mean, I would  
10 say I'd have an awareness of this issue being  
11 that --

12 Q Well, let's just be clear what issue we're  
13 talking about.

14 A Okay.

15 Q The issue I'm talking about is that your  
16 claim that the words "Washington Redskins" disparage  
17 Native Americans, okay, when did you become aware of  
18 that issue in your own mind?

19 A Probably in middle school.

20 Q So now we're talking about your being from  
21 somewhere to fourth to eighth grade?

22 A About seventh to ninth grade.

23 Q Okay. So we're talking about maybe 1999,  
24 somewhere around there, '98, '99, you were like  
25 maybe 10, 11 years old?

1           A     Maybe a couple years older, 12, 13, 12,  
2     13.

3           Q     Okay. So now you're in, let's say, eighth  
4     grade?

5           A     Uh-huh.

6           Q     12 or 13 years old, you're at 1999, and  
7     what exactly do you learn?

8           A     Well, I was playing sports during that  
9     time.

10          Q     Right.

11          A     And different sports teams have different  
12     mascot names.

13          Q     Right.

14          A     And, of course, I was beginning to develop  
15     into my own person and I just from playing those --  
16     from competing in sports, I just remember that the  
17     different mascot names, including Redskins, were  
18     disparaging, so that's what I remember, that's when  
19     I remember becoming aware of it.

20          Q     So you -- but you already -- before you  
21     were 12 or 13 years old, you already knew about the  
22     Washington Redskins; right?

23          A     Yeah, because of their -- their being in  
24     the NFL.

25          Q     Yeah, they were on TV, your brother would

1 watch it at the house, watch them play the Vikings  
2 when you were 11; right?

3 A Right.

4 Q And he was 19 and you saw the Washington  
5 Redskins play the Vikings on TV?

6 A Right.

7 Q Right?

8 A Uh-huh.

9 Q That's what you said.

10 A Right.

11 Q So, now, what about mascot names is new to  
12 you when you're all of a sudden playing sports?

13 A Because I was a part of it.

14 Q Part of what?

15 A I was a part of the disparaging, I was a  
16 part of that, you know, whenever you see the  
17 Washington Redskins, whenever you see that logo and  
18 you're 11 years old, you know, you see something  
19 that's not -- that's -- that's not a true depiction  
20 of who I am, who you are. Of course, you have these  
21 questions, but at 11 years old, where do you really  
22 go with those questions? So then as I'm getting  
23 into playing sports, myself being -- me being on the  
24 playing field or on the court, and those mascots  
25 being represented, you become a part of it.

1 Q Okay. So you become a part of it, you  
2 mean you were on a team that had a mascot that was  
3 called the Redskins?

4 A No, no, that's not what I'm saying. I'm  
5 saying that I was on a team where we played  
6 opponents who had the name Redskin or who had other  
7 different types of Indian mascots, so.

8 Q You played a team called the Redskins?

9 A Yes.

10 Q What team was that?

11 A Capitol Hill.

12 Q Capitol Hill Redskins. That's -- what  
13 team did you play on?

14 A I played on the Highland West Panthers.

15 Q Highland West Panthers?

16 A Yes.

17 Q So basketball?

18 A Basketball.

19 Q Okay. And so the team nickname for  
20 Capitol Hill Redskins is Redskins, for Capitol Hill  
21 High School was the Redskins; is that right?

22 A Yes.

23 Q Is it still Redskins?

24 A Yes.

25 Q Is Capitol Hill a Native American school?

1           A       It's a diverse school.

2           Q       Diverse?

3           A       Uh-huh.

4           Q       So it has Native Americans and non-Native  
5 Americans?

6           A       Yes.

7                   MR. WALLACE:  Objection.

8           Q       (By Mr. Raskopf)  Do you know what the  
9 proportions are?

10          A       Nope.  I know that they're predominantly  
11 Hispanic.

12          Q       Okay.  Did any Native Americans play on  
13 the Capitol Hill Redskins team?

14          A       I don't remember.

15          Q       Any Native Americans play on your team?

16          A       Just me.

17          Q       Okay.  You were the only Native American  
18 who played on Highland West Panthers basketball  
19 team?

20          A       Yes.

21          Q       What year, what grades did you play?

22          A       Seventh through ninth grade.

23          Q       Okay.  So now, all of a sudden, you're on  
24 the court, you're playing the Redskins, not the  
25 Washington Redskins, you're playing another team

1       called Redskins; right?

2           A       Right.

3           Q       Not the football team that you already  
4       knew about named the Washington Redskins; right?

5           A       Right.

6           Q       You know you're not playing the Washington  
7       Redskins that day?

8                   MR. WALLACE:  Objection.

9                   THE WITNESS:  Yes.

10          Q       (By Mr. Raskopf)  Right?  That's clear?  
11       So now you're playing the Capitol Hill Redskins and  
12       what troubles you about the Capitol Hill Redskins  
13       for the first time?

14                   MR. WALLACE:  Objection.

15                   THE WITNESS:  Their mascot.  The picture  
16       of --

17          Q       (By Mr. Raskopf)  I don't have the mascot  
18       in front of me, what does their mascot look like?

19          A       It's a picture of a Indian head with -- or  
20       a made up Indian head, I don't know.

21          Q       Like a --

22          A       Like a drawing, like a painting.

23          Q       In your mind, the caricature of an Native  
24       American in traditional headdress?

25                   MR. WALLACE:  Objection.

1           THE WITNESS: I wouldn't say traditional  
2 headdress.

3           Q       (By Mr. Raskopf) All right. You tell me.  
4 You don't even need to describe it. There was a  
5 mascot that the Capitol Hill Redskins used that you  
6 thought disparaged Native Americans?

7           A       Yes.

8           Q       And that was the extent of your concern;  
9 right?

10          A       Because it didn't -- the picture of the  
11 mascot that was supposed to be symbolic of a Redskin  
12 was not -- was thought up to be symbolic of Native  
13 Americans, which didn't represent Native Americans  
14 or didn't represent -- didn't represent Native  
15 Americans as I've seen them, and so it was a  
16 misrepresentation to me.

17          Q       All right. So you thought that this  
18 mascot image misrepresented Native Americans?

19          A       Yes.

20          Q       Okay. And that was the focus of your  
21 concern; right?

22          A       Yes.

23          Q       Okay. So if they made another -- have you  
24 ever seen a mascot that you are comfortable with  
25 representing Native Americans?

1           A     No.

2           Q     So you don't think any mascot would ever  
3 satisfy you in terms of their being not a  
4 disparaging or derogatory representation of Native  
5 Americans?

6                   MR. WALLACE:  Objection.

7                   THE WITNESS:  Nope.

8           Q     (By Mr. Raskopf)  So you don't think it's  
9 possible to do, or you just think the artistry's bad  
10 every time so far?

11                   MR. WALLACE:  Objection.

12                   THE WITNESS:  I don't think that Native  
13 Americans should be used as a symbol of a mascot, as  
14 a mascot to be represented of a team.

15           Q     (By Mr. Raskopf)  Okay.  And that's what  
16 you saw when you were out there playing against the  
17 Capitol Hill Redskins, so it was the mascot you  
18 didn't like; right?

19           A     Yeah.

20           Q     And that's what troubled you; right?

21           A     Yes.

22           Q     Okay.  So it wasn't so much the name, it  
23 was really the mascot which made you really  
24 horrified about the situation; correct?

25           A     No, the name bothered me, too.



1           Q     Okay. Well, you're saying that now, but  
2     you focused on the mascot before because the mascot  
3     really bothered you; right?

4           MR. WALLACE: Objection.

5           THE WITNESS: No, they both bothered me.

6           Q     (By Mr. Raskopf) Okay. So, now, what  
7     bothered you about the nickname, without the mascot?

8           A     Because it's a nickname and who's really a  
9     Redskin, what Native American tribe out there of the  
10    530 some-odd tribes in the United States have the  
11    name Redskin as their tribe, as representing who  
12    they are? Who's a Redskin?

13          Q     So that meaning, the word "redskin" is  
14    indefinite, it has an indefinite meaning then  
15    because it doesn't really focus on any specific  
16    tribe?

17          A     No, because it doesn't focus on any  
18    specific person, but yet, it's represented by a  
19    Native American, so it's -- I mean, to me it's -- I  
20    would say -- I mean, the term "redskin" doesn't  
21    represent a Native American, nor does it represent a  
22    Native American tribe, so why is that term coined to  
23    a Native American to a symbol of a Native American  
24    as a mascot?

25          Q     If it represented a tribe, the word

1 "redskins," then that would be okay with you, like,  
2 for example, the Florida Seminoles?

3 MR. WALLACE: Objection.

4 Q (By Mr. Raskopf) Which does represent the  
5 Florida Seminoles college team, represents the  
6 Seminoles tribe?

7 MR. WALLACE: Objection.

8 Q (By Mr. Raskopf) Do you know that?

9 A I know that.

10 Q Okay. So that -- that's okay, because  
11 there the logo is being used with the authority of  
12 the tribe and then so it's their symbol that's being  
13 used by the college; right?

14 A Not necessarily.

15 Q I'm sorry, I don't know what you mean by  
16 that.

17 A To me it's not okay because the --  
18 although the Seminole Nation gave permission to the  
19 Florida Seminoles to name their college that, the  
20 representation of the Seminole as a mascot is still  
21 a misrepresentation of the Seminole people, and our  
22 society isn't educated enough to tell the difference  
23 between a Seminole Indian and other Indians.

24 Q So what if the Seminoles are okay with the  
25 way the mascot looks?

1           A       Then it's still not okay with me.

2           Q       So even a use by -- of a tribal name by a  
3 college team with the authority of the tribe,  
4 approved by the tribe, name and mascot, that use  
5 would still, in your view, disparage Native  
6 Americans?

7           A       Yes.

8           Q       Such that you would be -- if they had a  
9 registration, a federal registration, just like the  
10 Washington Redskins do, you would be just like  
11 you're petitioning to cancel the Redskins' marks,  
12 you would be willing to sign your name to a petition  
13 to cancel the Seminoles' marks?

14                   MR. WALLACE:  Objection.

15          Q       (By Mr. Raskopf)  Right?

16          A       I don't know.

17          Q       You might or might not be?

18          A       I mean, I'm not saying I might or might  
19 not be, I'm just saying that's not -- that's not the  
20 intent right now.  The intent is that the Redskins  
21 are not a tribe, the Redskins are not a  
22 representation of Native American people.

23          Q       I'm asking you about the Seminoles right  
24 now, not asking you about the Redskins.

25          A       Okay.

1           Q     I just want to know whether you said you  
2     don't know whether you would file --

3           A     I don't know.

4           Q     -- to cancel the Seminoles' marks if they  
5     had registrations for those marks, even though they  
6     disparage Native Americans, even with --

7           MR. WALLACE:   Make sure you let him  
8     finish.

9           Q     (By Mr. Raskopf)   Hold on, let me finish  
10    my question.   Even though they disparage Native  
11    Americans, you might not file against the Seminoles?

12          A     I didn't say I would or wouldn't, I said I  
13    don't know.

14          Q     You're thinking about it?

15          MR. WALLACE:   Objection;  
16    mischaracterization.

17          Q     (By Mr. Raskopf)   Well, what do you need  
18    to know in order to tell me yes or no right now,  
19    what do you need to think about before you can  
20    answer that question?

21          A     I don't know.

22          Q     Who's the first person who contacted you  
23    about joining your petition to cancel the Redskins'  
24    registrations?

25          A     Suanne Ware-Diaz.

1           Q     You mentioned her before, she's a female  
2     mentor you said?

3           A     Uh-huh.

4           Q     Is she an activist?

5           A     Yes.

6                     MR. WALLACE:  Objection.

7           Q     (By Mr. Raskopf)  You believe she's an  
8     activist; right?

9           A     Yes.

10          Q     And how did she contact you?

11          A     By phone.

12          Q     She called you up, was this in 2011 -- I'm  
13     sorry, in 2006 or earlier?

14          A     2006.

15          Q     And when in 2006 did she contact you?

16          A     Probably July, I mean, probably July,  
17     about this case, probably July.

18          Q     And how do you know it was July, are you  
19     just guessing?

20          A     I'm just kind of guessing based off the  
21     petition date.

22          Q     What did she say to you?

23          A     She just mentioned that there was a  
24     petition going before and if I was interested in it,  
25     then I had -- I could let her know and she could

1 pass my information along to Suzan Harjo, who would  
2 pass it along to Philip Mause.

3 Q Where were you, this was a phone call, so  
4 she called you, where did you receive the call?

5 A It was probably at my work.

6 Q Where were you working at the time?

7 A Sonic Drive-In.

8 Q Were you a student at the time as well?

9 A I was going to be, yeah, I was in between.

10 Q Between high school and college?

11 A Yes.

12 Q How many years off did you have, off  
13 school did you have between graduation from high  
14 school and starting college?

15 A Three months.

16 Q So this was in the summer?

17 A The summer.

18 Q So she reached you at Sonic?

19 A On my cell phone.

20 Q Okay. So she called you during -- were  
21 you working during the day or at night at that time?

22 A Probably during the day.

23 Q But you don't have a clear recollection  
24 when it was or you think she called you during the  
25 day?

1           A     During the day.

2           Q     How did you know -- what was your prior  
3 relationship with your mentor?

4           A     I had sat on a Commission on Religion and  
5 Race for the United Methodist Church.

6           Q     Is she affiliated with United Methodist  
7 Church?

8           A     Yes.

9           Q     What is her affiliation?

10          A     She's a member of the United -- of a  
11 United Methodist Church, and at the time, she was  
12 one of the executive board members of the General  
13 Commission on Religion and Race.

14          Q     Is she Native American?

15          A     Yes.

16          Q     What tribal affiliation?

17          A     I believe, I don't know -- I don't know if  
18 she's enrolled for sure, but I know she's Native  
19 American and I think she might be Kiowa.

20          Q     How do you know that or how do you  
21 believe?

22          A     Well, her father is from the Kiowa Tribe,  
23 he's from where our -- he's from around the area  
24 that our family is from. But she's also other  
25 tribes, I think she may be -- I'm not for sure, she

1     may be Delaware, Caddo, it seems like there's  
2     something there in my mind telling me she has those  
3     bloodlines, also. But I'm not for sure.

4             Q     How does she know Suzan Harjo?

5             MR. WALLACE: Objection.

6             THE WITNESS: I don't know. I mean,  
7     colleagues in the same area, I guess.

8             Q     (By Mr. Raskopf) And this Committee on  
9     Race and Relations?

10            A     Religion and Race.

11            Q     Religion. I'm sorry, are my questions  
12     keeping you up, you want to take a break?

13            A     No, I'm good, I just haven't had -- I'm  
14     good.

15            Q     Just want to be sure you're -- you're  
16     understanding my questions; right?

17            A     Right.

18            Q     Okay. Just wanted to be sure. How long  
19     were you on the Committee on Religion and Race?

20            A     From 2004 to 2008.

21            Q     And this was -- what was your role on the  
22     committee, did you meet, have formal meetings, did  
23     you receive literature, how did it work?

24            MR. WALLACE: Objection; compound.

25            THE WITNESS: We met, I received e-mails,



1 I received a book of -- like a binder.

2 Q (By Mr. Raskopf) So you were about 17  
3 when you got on the committee? 2004, you said?

4 A Yes.

5 Q So were you a high school student at the  
6 time?

7 A Yes, I was about 16 or 17.

8 Q All right. And what caused you to reach  
9 out to this committee and join it?

10 MR. WALLACE: Objection.

11 Q (By Mr. Raskopf) Are you a Methodist?

12 A Yes.

13 Q Practicing?

14 MR. WALLACE: Objection; vague.

15 Q (By Mr. Raskopf) You may answer the  
16 question.

17 A What do you mean by practicing, like I'm a  
18 member of the United Methodist Church?

19 Q No, you already said you're a member.

20 A Do I attend church?

21 Q Yes.

22 A Not always.

23 Q Okay. Do you -- how frequently do you  
24 attend church?

25 A In the last probably four to -- four years

1 or so, it's been about maybe once a month.

2 Q Where is your church located?

3 A My membership is held at Norman First  
4 American United Methodist Church.

5 Q So that's in Norman, Oklahoma?

6 A Yes.

7 Q How long have you had a membership there?

8 A Since I was probably 14.

9 Q Okay. So if you go to church, that's the  
10 church you usually go to?

11 A Not in the last couple years, because of  
12 location.

13 Q Right, okay. So there's another church  
14 that you go to now once a month or so?

15 A Yeah. Either Mary Lee Clark United  
16 Methodist Church or Pawnee Indian United Methodist  
17 Church.

18 Q So for about the last three years you've  
19 not sat on the Committee on Religion and Race;  
20 right?

21 A Right.

22 Q Is it still in existence?

23 A Yes.

24 Q You just resigned from it?

25 A Yes.

1           Q     Okay. Did you have to formally resign or  
2     you just stopped attending?

3           A     My -- sorry, my -- I held the position  
4     that I was in from 2004 through 2008, they turn over  
5     by quadrenniums, and I would have been allowed to  
6     have served two quadrenniums, however, I chose not  
7     to because of school obligations and family.

8           Q     Are you active in any other committees  
9     where race or religion are a issue at present?

10          A     I would say no.

11          Q     So after you spoke to Ms. Ware, what was  
12     the next time that you had a connection to the  
13     circumstances leading up to the petition?

14          A     After I spoke to Suanne Ware, I believe  
15     she passed my information along to Suzan Harjo, who  
16     passed it along to Philip Mause, what I can  
17     remember. Philip Mause, I talked to a little bit  
18     more, or I guess in further detail about the case,  
19     once I gave confirmation to Suanne that I was  
20     interested and it was okay to pass along my contact  
21     information.

22          Q     Did you ever speak directly to Suzan  
23     Harjo?

24          A     I don't think I spoke to her directly by  
25     phone, probably by e-mail more so.

1           Q       So she may have e-mailed you and you  
2 e-mailed her back or you may have e-mailed her and  
3 she e-mailed you back?

4           A       Right.

5           Q       And -- but you have -- you don't recall a  
6 single time in which you spoke either on the phone  
7 or in person with Ms. Harjo?

8                   MR. WALLACE: Objection; vagueness as to  
9 time.

10          Q       (By Mr. Raskopf) Ever, to make it clear?

11          A       Yes, I've talked to her in person whenever  
12 I initially met her at a board meeting, probably in  
13 2004, thereabouts, whenever I was on the Commission  
14 of Religion and Race, I spoke to her probably then  
15 in a group setting.

16          Q       So you met Ms. Harjo before Ms. Ware told  
17 you about the possibility of starting a new case?

18          A       Yes.

19          Q       Okay. And that's when you met Ms. Harjo  
20 in person?

21          A       Yes.

22          Q       Other than meeting her then in person, you  
23 don't remember any other time since then that you've  
24 ever spoken to her or met her in person, except  
25 through e-mails?

1           A     At our last board meeting in 2008, I  
2     believe she was -- no, it wasn't a board meeting, it  
3     wasn't affiliated with the Religion and Race, it was  
4     actually a youth event that was held in Washington  
5     at the Native American museum there, the  
6     Smithsonian, she was there and I had seen her there.  
7     She was there speaking to a group and I happened to  
8     be there and took a picture with her.

9           Q     Okay. So you met up, or just said hello?  
10    What communications did you have with her, other  
11    than saying, hey, can I have a picture with you?

12          A     She was there doing a speaking engagement  
13    and I went to say hello and how are you maybe, I  
14    don't remember, but it was very brief because she  
15    was very busy and we just -- and we hadn't seen each  
16    other since 2004, so we just took a picture, her and  
17    I and a couple others.

18          Q     Did you discuss the case at all?

19          A     I don't think so.

20          Q     Okay. When you met with her in 2004, did  
21    you discuss the case?

22          A     She talked about her case that had went  
23    before already and that was about it. And that was  
24    whenever I had become knowledgeable about her  
25    side -- her case had already went on.

1 Q All right. So this is in 2004, you go to  
2 a presentation at which Suzan Harjo is present and  
3 discussing her experience in her Harjo case?

4 A Yes.

5 Q All right. And so you're about 17 years  
6 old when you see her presentation; right?

7 A Yes.

8 Q And do you -- did you have any personal  
9 time with her or did you just hear her presentation  
10 and that was it?

11 A Not personal one-on-one, probably in a  
12 group, maybe at a dinner is where I could  
13 probably -- I don't remember exactly.

14 Q Okay. You don't remember any substantive  
15 discussions about her case in any -- anywhere, other  
16 than during her formal presentation?

17 A Right.

18 Q Okay. So you've not really ever had  
19 face-to-face, one-on-one discussion with Suzan Harjo  
20 about your participation in this case, your case?

21 A Not face-to-face.

22 Q Right. And not on the phone, only via  
23 e-mail; correct?

24 A Not that I can remember on the phone, I  
25 remember e-mails.

1           Q     Okay. So over the years you've had four  
2 e-mail accounts?

3           A     Yes.

4           Q     Okay. And when for the first time did you  
5 learn that you were supposed to hold on to e-mails  
6 that related to your case?

7           A     Probably a year ago.

8           Q     Okay. So before a year ago, which puts us  
9 into October of 2010, so all the way up to October  
10 2010, you had no idea that you were supposed to save  
11 e-mails that related to your case against the  
12 Washington Redskins; is that right?

13          A     Right.

14          Q     And there were e-mails that you received  
15 from 2006 all the way up to October 2010 that  
16 related to this case that you deleted; right?

17          A     Probably.

18          Q     Because you didn't know you were supposed  
19 to keep them; right?

20          A     Right.

21          Q     No one told you; right?

22          A     Not that I can remember, not that I  
23 remember hearing someone tell me to keep an e-mail.

24          Q     Well, if somebody told you to keep an  
25 e-mail, you would have kept it; right?

1           A       They may have told me, but I might not  
2       have remembered or I might have not heard them, but  
3       from my knowledge, I don't remember being notified  
4       that I should keep all e-mails relating to the  
5       Washington Redskins case.

6           Q       So your recollection is that no one told  
7       you; right?

8           A       Right.

9           Q       I want to be clear about that. That's the  
10      best of your recollection?

11                  MR. WALLACE: Objection; asked and  
12      answered.

13          Q       (By Mr. Raskopf) You were not informed  
14      that you should preserve documents relating to your  
15      case against the Washington Redskins until October  
16      of last year?

17                  MR. WALLACE: Objection.

18                  THE WITNESS: Yeah, I don't remember.

19          Q       (By Mr. Raskopf) You don't remember being  
20      told?

21          A       I don't remember being told.

22          Q       Right. So as far as you can recall, you  
23      weren't told; right?

24          A       Right.

25          Q       And you had an account called



1 EC421\_coco@yahoo.com?

2 A Yes.

3 Q How long have you had that account?

4 A I don't remember, I was probably in  
5 seventh grade, so 2000, 2000, 2001; is that correct?

6 Q Okay. So it started about the turn of the  
7 century, maybe a little after, and you still have  
8 it?

9 A Yes.

10 Q All right. You've never turned it off?

11 A No, I can't turn it off.

12 Q Right. And you use it regularly?

13 A No.

14 Q When did you stop using it regularly?

15 A Probably 2000 -- probably 2006, 2005,  
16 2006.

17 Q Was that when you went to college?

18 A Yes, when I graduated.

19 Q High school?

20 A High school.

21 Q You still have it?

22 A I still have it, but I probably haven't  
23 used it since I was a junior in high school, which  
24 would have been about 2005, 2006.

25 Q Well, do you ever get e-mails through it?

1           A     All the time.

2           Q     So you check it once in a while?

3           A     No.

4           Q     So then how do you know you get e-mails  
5 all the time if you don't check it?

6           A     Well, because I checked it for this and I  
7 had about 3,000, 4,000 e-mails to sift through, so I  
8 know that I get e-mails on there all the time.

9           Q     And when for the first time -- how much of  
10 a period of time was there between the time you  
11 stopped using it and the time that you checked it  
12 for this case?

13          A     From 2005, 2006 till probably a couple  
14 months ago.

15          Q     Sometime in 2011 probably when you made a  
16 production in this case maybe?

17          A     Yes.

18          Q     All right. You made a production in  
19 March, and a production in August and a production  
20 in September, do you remember which of those it was?

21          A     September.

22          Q     Okay. So you hadn't visited that e-mail  
23 address until September?

24          A     Yes.

25          Q     Okay. So someone -- you were reminded to

1 do that?

2 A Yes.

3 Q And so then you opened the  
4 CTsotigh.stu@OKCU.edu account?

5 A I probably opened the  
6 CourtneyTsotigh@yahoo.com account in replace of the  
7 EC421.

8 Q Okay.

9 A And then I was assigned the  
10 CTsotigh@OKCUedu when I was an undergrad at OCU.

11 Q Let me just go back quickly to the EC421,  
12 when you say you searched your e-mails for documents  
13 having to do with this case?

14 A Yes.

15 Q And did you come across any?

16 A I think a few.

17 Q And did you produce them?

18 A Yes.

19 Q Okay.

20 MR. WALLACE: Counsel, if it's convenient,  
21 I'd like to take a short break.

22 MR. RASKOPF: Sure. Want to take break  
23 for five, ten minutes?

24 MR. WALLACE: Sure.

25 MR. RASKOPF: No problem.

1 (Break taken from 10:44 to 10:55)

2 Q (By Mr. Raskopf) Back on the record.

3 Ms. Tsotigh, I'm going to show you a document that's  
4 previously been marked in the Pappan deposition as  
5 Exhibit 13.

6 MR. WALLACE: Do you have another copy of  
7 that?

8 MR. RASKOPF: No, sorry.

9 Q (By Mr. Raskopf) Take a moment to look at  
10 it, tell me whether you've seen it before. Have you  
11 seen Exhibit 13 before?

12 A Yes.

13 Q Do you remember receiving it?

14 A Yes.

15 Q It came to you via e-mail from Suzan  
16 Harjo; right?

17 A Yes.

18 Q In August of 2006?

19 A Yes.

20 Q And she sent it to you at your Coco e-mail  
21 address; right?

22 A Yes.

23 Q Did you respond to it?

24 A I don't remember.

25 Q If you did respond, it would be -- you

1 would have responded through your e-mail account;  
2 right?

3 A Yes.

4 Q You would have hit reply and sent  
5 something?

6 A Yes.

7 Q Did you do that?

8 A I don't remember.

9 Q When you say that you looked through this  
10 e-mail account recently in the last month to find  
11 responsive documents, what method did you employ to  
12 do that?

13 A I did a search through the e-mails.

14 Q I know, what do you mean by search, what  
15 was the -- what were the criteria of the search that  
16 you employed to locate documents responsive to  
17 request for production?

18 A Well, searches such as from different  
19 persons on the case, searches for the Redskins,  
20 anything that I might have received from that,  
21 Native Americans, anything in that nature.

22 Q Do you have a copy of the search terms  
23 that you employed?

24 A No.

25 Q So were they suggested to you what you

1     should -- what terms you should use or did you make  
2     them up yourself?

3             MR. WALLACE:   Going to object to the  
4     extent that it would reveal privileged  
5     communications.   You can answer to the extent that  
6     it would not reveal those communications.

7             THE WITNESS:   Okay.   Well, I, myself, had  
8     an idea of what I was looking for, so I just was  
9     assisted and searched for different things that  
10    might have been in the context of the e-mail.

11            Q     (By Mr. Raskopf)   When you say you were  
12    assisted, what do you mean by that?

13            A     Well, I was assisted by Lee.

14            Q     Who's Lee?

15            A     Lee Roach.

16            Q     Okay.   By that, did you turn your database  
17    over to Lee Roach, did you turn your account over to  
18    Lee Roach?

19            A     No.

20            Q     Did you send all your sent items to Lee  
21    Roach?

22            A     I sent all my search results.

23            Q     You sent your search results, okay.   So  
24    you were the person and only you are the person who  
25    actually physically conducted searches on that --

1 the EC421 Coco Yahoo account; right?

2 A Yes.

3 Q And how many search terms did you employ?

4 A Right off the top of my head, I did all  
5 the names you see here.

6 Q Okay. So, for example, you did a search  
7 for Harjo?

8 A Yes.

9 Q Blackhorse?

10 A Yes.

11 Q Pappan?

12 A Yes.

13 Q Briggs?

14 A Yes.

15 Q Gover?

16 A Yes.

17 Q Lone-Bentley?

18 A Yes.

19 Q Anyone else that you can remember?

20 A Suanne Ware, Jacob Tsotigh, those are the  
21 ones I can remember.

22 Q You can't remember any others, as you sit  
23 here?

24 A Oh, I did Philip Mause. Those are the  
25 names that I did. I did NFL, I did Redskins, I did

1 Native Americans, those are the ones I can remember.

2 Q Those are all -- the only ones you can  
3 remember, as you sit here?

4 A I think so, yeah.

5 Q And you didn't write down on a piece of  
6 paper or type out a list of the search terms that  
7 you employed to look for documents on your e-mail  
8 account?

9 A No.

10 Q At one point, did you have that list of  
11 names or terms on a document?

12 A No.

13 Q You just did it from -- did you have any  
14 aid whatsoever when you started conducting searches  
15 on this e-mail account?

16 A Not that I can remember.

17 Q Okay. Which fields in the e-mail account  
18 did you search?

19 A Like are you talking about the in box, the  
20 sent mail, the drafts?

21 Q I'm asking you, right.

22 A Is that what you're asking?

23 Q Yeah.

24 A Okay. I did all of them.

25 Q Okay. You searched your in box?



1           A     Yes.

2           Q     You searched your sent items?

3           A     Yes.

4           Q     Sent your drafts?

5           A     Yes.

6           Q     Anything else? You have file cabinets?

7           A     I searched my spam, I searched my folder  
8     that had -- that was designated for this case, I  
9     searched my school folder, I searched my trash can.

10          Q     Can they all be searched in a single  
11     search or do you have to conduct a search for each  
12     field?

13          A     It's either one, you can do a entire  
14     mailbox search or you can go to each field and do  
15     it. I think if any of them aren't on the search all  
16     mail, it's the trash can, your recycled.

17          Q     You can do everything except for the  
18     trash, then you got to do the trash separately, so  
19     trash separately, is that what you're saying?

20          A     I think so, if I remember right, I think.

21          Q     Trash isn't really deleted, it's just put  
22     in a separate folder or is there a period of time  
23     when it becomes deleted if you don't haul it out of  
24     trash?

25          A     I want to -- I'm not sure. I have to look

1 on the e-mail, but it may expire at a certain date,  
2 30 days, 60 days, 90 days.

3 Q All right. Now, this document, Pappan 13,  
4 if it was on -- in your e-mail box somewhere, it  
5 would have come up on your search; right?

6 A Yes.

7 Q Unless you had deleted it; right?

8 A Right.

9 Q And you didn't produce this document, do  
10 you know that?

11 A Nope.

12 Q Okay. Well, you have not produced this  
13 document to us.

14 A Okay. It was probably deleted.

15 Q Okay. And what would have caused you to  
16 delete an e-mail like this from your account? I'm  
17 referring to Pappan 13.

18 A I think probably at the time that I  
19 deleted it, I wasn't aware of the significance that  
20 it would play later on in the case, so I probably  
21 was trying to make space, so I didn't have to look  
22 at 1,000 e-mails.

23 Q Well, this e-mail was sent to you right  
24 around the time that the petition was filed; right?

25 A Yes.

1           Q     And Suzan Harjo was quoting you or telling  
2     you that she loved your quotes in the Daily  
3     Oklahoman, and that was about the case; right?

4           A     Somewhat it was about the case, they  
5     recognized that I was on the case, yeah.

6           Q     It concerned the case?

7           A     Sure.

8           Q     And you deleted this because you wanted to  
9     preserve space on your e-mail account; is that  
10    right?

11          A     Yeah, probably.

12          Q     Do you know what the maximum space  
13    allotted to your in box is on Yahoo account?

14          A     Probably would have contained 4,000  
15    e-mails that are on there right now.

16          Q     Did you ever get a notice from Yahoo that  
17    you're going to have to start deleting e-mails in  
18    your in box because you were running out of space in  
19    your in box?

20          A     No.

21          Q     Now, do you ever use any of your e-mail  
22    accounts to discuss your views about -- discuss your  
23    personal views about the petition with any other  
24    persons?

25          A     I don't know.

1 Q You don't remember or you don't know?

2 A I don't remember.

3 Q Do you know what the earliest -- do you  
4 know that your production from this e-mail account  
5 only goes back to August, the month of August 2008?

6 A I didn't know that.

7 Q So I'm representing that we got no  
8 information from you from this mailbox that was  
9 prior to August 2008, so that everything was deleted  
10 that related to this case up to August of 2008, did  
11 you know that?

12 A I didn't know that, but it's likely.

13 Q Does that sound right?

14 A Probably.

15 Q Okay. So have you ever e-mailed one of  
16 your friends using this account and said -- using  
17 the EC421 Coco account and said, I really don't  
18 believe in the things that I've said in this  
19 petition, but I'm doing it to advance other causes?

20 A No.

21 Q You sure of that?

22 A Pretty sure. I don't think I discussed  
23 this matter with many people.

24 Q Have you ever told anybody you really have  
25 a personal view, but that's different than your

1 public view about whether the term "Washington  
2 Redskins" is disparaging or not?

3 A I don't think so.

4 Q Have you ever used the word "redskin" in  
5 an e-mail?

6 A I don't remember.

7 Q Have you ever used the word "redskin" to  
8 jokingly refer to one of your friends in an e-mail?

9 A No.

10 Q Have you ever worn Washington Redskins  
11 paraphernalia?

12 A No.

13 Q Have you ever seen anyone do that?

14 A Seen anyone wear Washington Redskins  
15 paraphernalia?

16 Q Yes.

17 A Yes.

18 Q Have you seen Native Americans wear  
19 Washington Redskins paraphernalia?

20 A Yes.

21 Q On how many occasions?

22 A I don't remember exact numbers, not often.

23 Q On the occasions when you see Native  
24 Americans wear Washington Redskins paraphernalia, do  
25 you have a practice of engaging them in discussion?

1           A     No.

2           Q     When you see someone wearing Washington  
3 Redskins paraphernalia, do you take it as a sign  
4 that they do not support your views?

5           MR. WALLACE:  Objection; vague.

6           THE WITNESS:  I would assume they  
7 wouldn't.

8           Q     (By Mr. Raskopf)  They would not; right?

9           A     Uh-huh.

10          Q     Because they're basically supporting the  
11 Washington Redskins by wearing Washington Redskins  
12 branded paraphernalia; right?

13          A     Yes.

14          MR. WALLACE:  Objection; lack of  
15 foundation.

16          THE WITNESS:  Sorry.

17          Q     (By Mr. Raskopf)  And you know that there  
18 are high school teams in Oklahoma that have the  
19 nickname Redskins; right?

20          A     Yes.

21          Q     And is it your father who is a principal  
22 of one of those high schools that has a nickname  
23 Redskins?

24          A     He used to be, he's no longer a principal  
25 there.

1 Q So how long was he principal there?

2 A From 2000 -- I think 2008 to about 2010.

3 Q And was he employed by that school before  
4 2008?

5 A Yes.

6 Q So he was a teacher there?

7 A Yes.

8 Q Okay. So how long was he employed --  
9 what's the name of the school?

10 A Capitol Hill.

11 Q Capitol Hill, you mentioned Capitol Hill  
12 before; right?

13 A Right.

14 Q Because you went to a high school that  
15 played against Capitol Hill?

16 A Yes.

17 Q Capitol Hill was called the Redskins;  
18 right?

19 A Yes.

20 Q So now what I understand is that you were  
21 playing a team at which your father -- for a high  
22 school at which your father was employed?

23 A Not at the time.

24 Q He subsequently became employed at the  
25 high school?

1           A     Yes.

2           Q     When did he first become employed at the  
3 high school?

4           A     I don't remember, 2000 -- I don't  
5 remember, I know he was there when I was in high  
6 school.

7           Q     When you were in high school, he was  
8 employed by the Capitol Hill Redskins?

9           A     Yes.

10          Q     Okay. And he drew a salary from there?

11          A     Yes.

12          Q     Is your mother employed?

13          A     Yes.

14          Q     She draws a salary from somewhere else?

15          A     Right.

16          Q     And he is also a member of the Kiowa  
17 Tribe; right?

18          A     Kiowa Tribe.

19          Q     Sorry, Kiowa, like the state of Iowa.

20          A     There you go.

21          Q     Got it. Okay. So he is a member of Kiowa  
22 Tribe?

23          A     Yes.

24          Q     And has been since he was born or shortly  
25 thereafter; right?



1           A     Yes.

2           Q     So when you filed your petition, was he or  
3 was he not employed by Capitol Hill High School?

4           A     He was.

5           Q     Had he only recently been employed there?

6           A     Yes. I think maybe 2005, maybe he began  
7 there, I want to say.

8           Q     So it was around the time that you were  
9 considering filing the petition against the  
10 Washington Redskins?

11          A     Yes.

12          Q     And when he became principal, the school  
13 name didn't change; right?

14          A     No.

15          Q     Did you petition the school to change the  
16 name?

17          A     No.

18          Q     Did he?

19          A     I think he didn't petition it, he made  
20 them aware that he was -- he did not agree with it,  
21 and he didn't like it.

22          Q     That's what he told you or did he actually  
23 do that?

24                   MR. WALLACE: Objection; foundation.

25          Q     (By Mr. Raskopf) Withdrawn. What do you

1 know that he actually did to -- in furtherance of  
2 what you just said, which is that he made the high  
3 school aware that he didn't like the name?

4 A He -- I believe he expressed his feelings  
5 about it with his -- the administrative colleagues  
6 at the school.

7 Q So he told you that?

8 A Yes.

9 Q You didn't personally witness him doing  
10 that?

11 A No.

12 Q Was there ever a meeting as far as you're  
13 aware convened to discuss the issue of the nickname  
14 Redskins for your father's high school?

15 A Not that I'm aware of.

16 Q You and he must have discussed this;  
17 right?

18 MR. WALLACE: Objection; vague.

19 Q (By Mr. Raskopf) You and your father must  
20 have discussed the fact that the nickname of the  
21 high school that he was working at and becoming a  
22 principal at was Redskins and that you were filing  
23 against the Redskins in Washington; right?

24 A Yes.

25 Q When for the first time did you discuss

1     that?

2           A     I would -- I don't know, I would say at  
3     the time -- during the time it had been approached  
4     to me.

5           Q     Okay. What did you say to him and what  
6     did he say to you?

7           A     I don't remember.

8           Q     You don't remember anything?

9           A     No.

10          Q     You ever have heated discussions with him?

11               MR. WALLACE: Objection; vague.

12               THE WITNESS: Heated discussions about  
13     what, this, no.

14          Q     (By Mr. Raskopf) In his mind, this is not  
15     a big deal?

16               MR. WALLACE: Objection; foundation.

17               THE WITNESS: I believe he's -- he cares  
18     about it.

19          Q     (By Mr. Raskopf) And you care about it?

20          A     I would say so.

21          Q     But he did draw a check from the school,  
22     right, for a couple years, four or five years;  
23     right?

24          A     Yeah.

25          Q     And your father supported you all this

1 time from 2006 to 2010?

2 MR. WALLACE: Objection; vague.

3 THE WITNESS: For about nine months.

4 Q (By Mr. Raskopf) Okay. Helped you pay  
5 the rent or whatever, or were you living at home?

6 A No.

7 Q You were living on your own?

8 A Yes.

9 Q So he would give you some money from time  
10 to time to --

11 A Occasionally.

12 Q -- help support you for things you needed;  
13 right?

14 A Yeah.

15 Q And that didn't bother you, even though  
16 you knew he was drawing money from a high school  
17 with the nickname called Redskins; right?

18 A He gets other sources of money and  
19 usually -- I mean -- so.

20 Q So you worked a way out in your mind that  
21 that didn't bother you; right?

22 MR. WALLACE: Objection;  
23 mischaracterization.

24 THE WITNESS: No, not necessarily, I mean,  
25 I was 18, 19 years old, so.

1 Q (By Mr. Raskopf) So?

2 A He's my father.

3 Q And you were over the age of majority?

4 A Yeah.

5 Q And he supported you at some level?

6 A Yes.

7 Q And at some level with money that he  
8 acquired from a school that had the nickname  
9 Redskins?

10 A Yes.

11 MR. WALLACE: Objection; foundation. You  
12 can answer.

13 THE WITNESS: Yes.

14 Q (By Mr. Raskopf) All right. Did he coach  
15 any sports teams?

16 A No.

17 Q What subjects did he teach?

18 A When he was teaching, he taught civics,  
19 history, geography.

20 Q Then he went into administration?

21 A Yes.

22 Q Well, he attended sports events; right?

23 A Well, like high school sports events, like  
24 their school sports events, college sports events?

25 Q No, let's talk about the high school, the

1 Redskins.

2 A Okay.

3 Q The Capitol Hill Redskins?

4 A Yes.

5 Q All right. The Capitol Hill Redskins,  
6 there's a place in Washington called Capitol Hill,  
7 you know that; right?

8 A Yes, I do.

9 Q This team is called the Capitol Hill  
10 Redskins, your father is a principal, it's after you  
11 file the petition, and what I want to know is, does  
12 he go to school events rallying for the team and,  
13 you know, to observe the events?

14 A Yes.

15 Q Okay. Does he even make speeches?

16 A No.

17 Q He doesn't say, you know, let's go out and  
18 beat the bad guys this week, Redskins?

19 A No.

20 Q That's what you think or that's what you  
21 know?

22 A I know.

23 Q How do you know that?

24 A Because I know my father. And he's a man  
25 who watches TV in his bedroom by himself.

1 Q He's quiet?

2 A He's quiet, he doesn't -- no, yeah, he's  
3 quiet.

4 Q As you sit here, are you aware of any  
5 other e-mail that you remember that you wrote or  
6 received that relates to this case that you deleted,  
7 just like you deleted that one, the Pappan 13?

8 A I don't remember.

9 Q Okay. But you know that a lot of -- you  
10 did delete a lot of e-mails?

11 A Yes.

12 Q All right. From all four of your  
13 accounts?

14 A Probably so.

15 Q Okay. The CTsotigh.stu@OKCU.edu account?

16 A Yes, sir.

17 Q Was your college account?

18 A Yes.

19 Q When did you open that?

20 A August 2006.

21 Q Which is when you began to matriculate at?

22 A Oklahoma City University.

23 Q Okay. And when was that account closed,  
24 if ever?

25 A 2008, October 2008 or -- probably 2009.

1 Q When did you graduate?

2 A December 2009.

3 Q So why -- you would have left it open  
4 until after you graduated or till about the time you  
5 graduated?

6 A Yeah, but they switched servers, they  
7 switched to a different type of server.

8 Q Right.

9 A And I graduated in 2009, so that's why I  
10 can't access it is because they switched servers to  
11 a different -- I guess I don't know what it's  
12 called, the end of your address, that changed, so it  
13 didn't delete at the time while I was in semester,  
14 but it would be like I wouldn't be able to access it  
15 unless I was enrolled in the next semester, which  
16 would give me a different name or a different e-mail  
17 address.

18 Q Right. So at some point, OKCU.edu was no  
19 longer a live e-mail address?

20 A Right.

21 Q For anybody?

22 A Right.

23 Q But before that, you knew it was coming;  
24 right? That you were going to be migrated, your  
25 e-mail account at the university was going to be



1 migrated to another name; right?

2 A Right.

3 Q And what did you do to preserve the  
4 information in your e-mail account, knowing that  
5 your old e-mail account would eventually be  
6 discarded?

7 A I believe I sent them to the Yahoo  
8 account, CourtneyTsotigh@yahoo.com.

9 Q So you migrated all your e-mail from the  
10 CTsotigh.stu account to the  
11 CourtneyTsotigh@yahoo.com account?

12 A Yes.

13 Q So anything you would have had in the  
14 Oklahoma University account would have gone to that  
15 account?

16 A Yes.

17 Q That you had not already deleted?

18 A Yes.

19 Q Okay. What was in that college account,  
20 let's call it the college account?

21 A Whatever -- what do you mean what was in  
22 that, e-mails from school, from --

23 Q Did it function as your primary account  
24 during the time that you were in school?

25 A It was between that account and the

1 CourtneyTsotigh@yahoo account.

2 Q Okay. And did you take any courses at  
3 college that involved mascots or Native American  
4 issues?

5 A No.

6 Q Did you receive any communications from  
7 any of the -- your co-petitioners through that  
8 account?

9 A I don't remember.

10 Q Do you know what the -- how frequently the  
11 in box or the sent items folders or boxes at this  
12 account were deleted?

13 A On the school account?

14 Q Yeah.

15 A College account?

16 Q School account, college account.

17 A Frequently, pretty frequently.

18 Q And you didn't do anything in this period  
19 to preserve any e-mails?

20 A I did on my Yahoo account, put everything  
21 into a folder with the case.

22 Q So if you had preserved anything about  
23 the -- your case or about this issue in general, you  
24 would have migrated it to the CourtneyTsotigh@yahoo  
25 account.

1           A     Yes.

2           Q     That's your testimony?

3           A     (Nods head).

4           Q     And, therefore, you would have produced it  
5 when you were requested to, if it hadn't been  
6 deleted; right?

7           A     Yes.

8           Q     Are you still in school?

9           A     Yes.

10          Q     What school?

11          A     OU.

12          Q     Taking a master's?

13          A     Yes.

14          Q     Do you have an e-mail address?

15          A     Yes.

16          Q     What is it?

17          A     I think it's CTsotigh-1@OU.edu.

18          Q     Did you search that account in connection  
19 with the request for production made of you by my  
20 client in this case?

21          A     Yes, but I didn't have anything because I  
22 don't use that e-mail account. I use  
23 CTsotigh@Gmail.com instead of the OU account because  
24 the name is long, so I don't even really mess with  
25 it except for to contact my professors.

1           Q     By the way, what does EC421\_coco stand  
2     for?

3           A     It was a name, it was a name from one of  
4     my basketball friends whenever I was 11 years old  
5     probably, 12 years old.

6           Q     Okay. I'll stop there then.

7           A     Exactly, that's why it isn't used.

8           Q     All right. No problem. So your Gmail  
9     account, that's the one you use now?

10          A     Yes.

11          Q     And you searched it?

12          A     Yes.

13          Q     How long has that been your primary  
14     account?

15          A     I don't know, I would guess 2008, I don't  
16     know. I'm not sure.

17          Q     Okay. You're aware that you sent us no  
18     documents from that account?

19          A     Probably so, because everything would have  
20     been received because the e-mails, everything would  
21     have been received at CourtneyTsotigh@yahoo.com.

22          Q     Not the Gmail account?

23          A     Not the Gmail.

24          Q     So you haven't told your colleague  
25     petitioners that you have a new e-mail address for

1       them to correspond with you?

2           A       Probably not.

3           Q       Has Suzan Harjo ever e-mailed you at that  
4       account address?

5           A       I don't remember.

6           Q       Well, if she had, then that would be an  
7       indication that she knew that that was your new  
8       e-mail address; right?

9           A       Probably.

10                   (Exhibit Tsotigh Number 2 marked for  
11                   identification and made part of the  
12                   record)

13          Q       (By Mr. Raskopf) Let me show you Exhibit  
14       2 for identification, have you seen it before? Have  
15       you seen the text of this e-mail before?

16          A       Not that I can recall.

17          Q       So you don't remember getting an e-mail  
18       from Suzan Harjo in January of 2010 saying --  
19       addressed to your Gmail account?

20          A       Huh-uh.

21          Q       You don't remember this?

22          A       I don't remember, I remember the subject  
23       matter.

24          Q       What was the subject matter?

25          A       Well, I remember the Blackhorse background

1 status, I remember seeing that, but I think I -- I  
2 don't know, I remember maybe seeing it in my Yahoo  
3 account, I don't remember.

4 Q This is addressed not to your Yahoo  
5 account, it's addressed to your Gmail account, do  
6 you see that?

7 A Yeah.

8 Q She didn't send this to your Yahoo  
9 account, do you see that?

10 A Yeah.

11 Q And the only reason we have this is  
12 because we got it from Amanda Blackhorse, not from  
13 you.

14 A Okay.

15 Q Do you understand that?

16 A I understand.

17 Q Okay. So though clearly you received this  
18 document and you say you searched your account --

19 A I may have deleted it.

20 Q Even though it's dated in January 2010?

21 A Yes. Like I said, I didn't know the  
22 significance of keeping the documents till probably  
23 middle of that year, till March, till we did the  
24 searches on our e-mails.

25 Q Why would you have deleted this, though,

1     it's a status and background of the Harjo and the  
2     Blackhorse cases, why would you have deleted this?

3           A     To filter out my e-mails.

4           Q     Filter out from what?

5           A     Because I don't like to hoard e-mails.

6           Q     And you would consider this hoarding an  
7     e-mail?

8           A     I don't know, I remember seeing the  
9     subject matter and it may have been on my Yahoo  
10    account, so maybe if I thought I had it on a  
11    different e-mail address where I had a designated  
12    folder for these e-mails, then I might have kept it  
13    on that e-mail address.

14          Q     Are you saying you forwarded this to your  
15    Yahoo account?

16          A     No, I didn't say that.

17          Q     Okay.

18          A     I'm saying if I had duplicate, if I had  
19    one in my Courtney Tsotigh, I might have mistaken  
20    it, I don't know.

21          Q     So where would you have gotten the  
22    duplicate?

23          A     On my CourtneyTsotigh@yahoo.com.

24          Q     You're saying someone would have sent this  
25    to you on that account?

1           A       Possibly. Majority of my e-mails dealing  
2 with this case is on the CourtneyTsotigh@yahoo.com  
3 that are not being -- that are related to the case  
4 with the exception of the attorneys.

5           Q       We didn't get Exhibit 2 from you through  
6 any account, through any production of yours, you  
7 understand that; right?

8           A       I understand.

9           Q       Either your Gmail or your Yahoo account,  
10 we just didn't get this from you, you understand  
11 that?

12          A       Okay. Yes. You didn't get it from me, I  
13 remember seeing the subject matter, but I don't know  
14 where.

15          Q       Did you respond to this e-mail?

16          A       I don't remember.

17          Q       If you had responded to it, it would have  
18 been your practice to delete the item anyway; right?

19          A       Possibly.

20          Q       Because you didn't want to hoard e-mails;  
21 right?

22          A       Probably so.

23          Q       An e-mail in is the same as an e-mail out;  
24 right? It's an e-mail?

25          A       I probably didn't reply to this e-mail



1 because I had a son in 2009, and from since 2009  
2 till about now, you know, I've been dealing with  
3 other matters, family matters, so. If I didn't  
4 respond, then I didn't respond. I don't remember if  
5 I responded.

6 Q So you don't even know if you responded,  
7 "Thanks for the info. Best regards, Courtney?"

8 A I don't know if I did.

9 Q Have you been made aware of other surveys  
10 that suggest that Native Americans do not support  
11 your petition to cancel the Redskins' marks because  
12 they don't believe the marks are harmful to Native  
13 Americans?

14 MR. WALLACE: Object as vague.

15 THE WITNESS: Isn't that the first  
16 question you asked me?

17 Q (By Mr. Raskopf) No. I asked you about a  
18 poll and you told me about one that you read about  
19 that was reported in the Daily Oklahoman, however,  
20 you haven't told me what that poll was, who  
21 conducted it, because I guess you didn't remember.

22 A I don't know.

23 Q So we're going to try to find out what  
24 that poll is.

25 A Okay.

1           Q     And now I'm asking you if you're aware of  
2     any other polls that also essentially say that  
3     Native America does not stand behind your petition  
4     in general?

5           A     I don't know, no, I'm not aware, I don't  
6     know.

7           Q     Have you ever heard of the Annenberg poll  
8     conducted by the University of Pennsylvania that  
9     suggests that far more Native Americans do not  
10    support your petition than do support your petition?

11          A     The University of Penn sounds familiar.

12          Q     You've read it?

13          A     Well, when I believe my uncle questioned a  
14    poll that was in -- that poll that was in the Daily  
15    Oklahoman, he wrote the writer of the column, and I  
16    believe the -- they said something about it was  
17    taken from a survey done at the University of  
18    Pennsylvania, so I think that's the one that may  
19    have been presented in that article that was -- that  
20    I had read about.

21          Q     Okay. So you learned about a University  
22    of Pennsylvania poll?

23          A     Uh-huh.

24          Q     That did not support or had a tendency not  
25    to support your petition for cancellation of the

1 Redskins' marks; right?

2 A Yes.

3 Q Did you investigate it further?

4 A No.

5 Q So you didn't contact the University of  
6 Pennsylvania and ask them to send you an explanation  
7 of the poll?

8 A No.

9 Q You didn't seek out other information that  
10 related to the poll?

11 A No.

12 MR. WALLACE: Objection.

13 Q (By Mr. Raskopf) What about the Harris  
14 poll conducted on behalf of Sports Illustrated that  
15 was reported in Sports Illustrated, are you aware of  
16 that poll?

17 A I believe I recall that.

18 Q And what do you know about that one?

19 A I think I -- I believe I just read  
20 something about it, I mean, it hasn't been recent,  
21 so I don't remember too much about it. I remember  
22 Sports Illustrated and a poll and reading about it,  
23 that's all I remember.

24 Q And after you read about it, you remember  
25 that the article reported that Native America does

1 not stand behind cancellation of the Redskins' marks  
2 because they don't believe that the term "Washington  
3 Redskins" for football disparages Native Americans?

4 MR. WALLACE: Objection.

5 THE WITNESS: I remember reading something  
6 about it.

7 Q (By Mr. Raskopf) Yeah, it wasn't  
8 favorable to your position; right?

9 A Right.

10 Q And so you read about something that  
11 wasn't favorable to your position that suggested  
12 Native America was not on the same side of the  
13 ledger as you are on this and you didn't do anything  
14 further; right?

15 A In regards to the survey?

16 Q Yeah.

17 A No.

18 Q Now, are you aware of any surveys, have  
19 you come across any surveys taken by independent  
20 third parties that suggests that Native America does  
21 support your petition?

22 A I don't remember.

23 Q Well, as you sit here today, you're not  
24 aware of any; right?

25 A Not that comes to mind.

1           Q     Well, you and your fellow petitioners  
2 haven't undertaken such a survey to try to figure  
3 out whether Native America stands behind your views  
4 or not; right?

5           A     Not that I've been a part of.

6           MR. RASKOPF: We'll take a break around  
7 noon, hopefully for half an hour.

8           MR. WALLACE: For lunch?

9           MR. RASKOPF: Yeah, if that's okay.

10          MR. WALLACE: Maybe a little longer, I  
11 don't know the food situation around here, we can  
12 try.

13          MR. RASKOPF: Forty-five minutes or  
14 whatever. I hope not to be too long after lunch.

15          Q     (By Mr. Raskopf) Going to show you Pappan  
16 Exhibit 10, this was an exhibit that was introduced  
17 through Ms. Pappan. Have you ever seen Exhibit 10  
18 before?

19          MR. WALLACE: You just asking if she's  
20 seen this specific document before?

21          Q     (By Mr. Raskopf) Yeah. Have you ever  
22 seen this specific document before? It's basically  
23 a release, it's an explanation of the survey by the  
24 University of Pennsylvania? Never seen it before?

25          A     I haven't seen this document before.

1           Q     All right. Haven't seen it before. But  
2     you knew about a survey from the University of  
3     Pennsylvania that says that basically 91 percent of  
4     Native Americans say that the term "Redskins" for  
5     the football team doesn't bother them?

6           MR. WALLACE: Objection.

7           Q     (By Mr. Raskopf) Right?

8           A     I've seen the results posted.

9           Q     Right. This is the results?

10          A     Uh-huh.

11          Q     Have you seen results, other than these,  
12     that this says Redskins is acceptable to 91 percent  
13     and 9 percent call it offensive?

14          A     I -- sorry, can you repeat that?

15          MR. RASKOPF: Read it back.

16          COURT REPORTER: "Have you seen results,  
17     other than these, that this says Redskins is  
18     acceptable to 91 percent and 9 percent call it  
19     offensive?"

20          THE WITNESS: So are you saying have I  
21     seen other survey results or this survey?

22          Q     (By Mr. Raskopf) No. This particular  
23     survey is the one that reports 91 percent are okay  
24     with it and 9 percent aren't, and this is the study  
25     that you were talking about, right, before when you

1       said, I've heard of the Pennsylvania study?

2           A       Yes.

3           Q       And these are the results?

4           A       Yes.

5           Q       This study was conducted in September  
6       2004, I think you said it was conducted several  
7       years ago?

8           A       Yes.

9           Q       Now, it says here under the word "date" or  
10       next to the word "date," September 24, 2004?

11          A       Yes.

12          Q       Do you have any information whatsoever as  
13       to what Native Americans thought of the term  
14       "Washington Redskins" in 1967?

15          A       Can you read that again?

16                COURT REPORTER:  "Do you have any  
17       information whatsoever as to what Native Americans  
18       thought of the term 'Washington Redskins' in 1967?"

19                THE WITNESS:  Not that I can produce for  
20       you right now.

21          Q       (By Mr. Raskopf)  There's no poll that  
22       you're aware of; right?  Like this; right?

23          A       I feel like I've read something about it,  
24       but I don't know exactly, like I said, I can't  
25       produce for you exactly for what that might be.

1 Q Okay. So going back 44 years now, going  
2 back to 1967.

3 A Yes.

4 Q And you're saying you might be aware of a  
5 poll taken in 1967?

6 A I don't know.

7 Q About Native Americans' views of the term  
8 "Washington Redskins"?

9 A I don't know.

10 Q You don't know what, you don't know that  
11 there is or you know that there is, but you don't  
12 remember exactly or what?

13 A I don't know.

14 Q What don't you know?

15 A I don't know if -- I don't know. The year  
16 sticks out significantly in my mind, but I don't  
17 know for what.

18 Q Well, maybe that's because the Redskins  
19 obtained a federal registration in 1967 and you're  
20 suing to cancel a mark that was recorded 44 years  
21 ago, is that perhaps why '67 sticks in your head?

22 A Perhaps.

23 Q All right. Now, I'm asking you whether  
24 you have a poll that says in '67, what Native  
25 Americans thought about Washington Redskins?



1           A       No, I don't have a poll.

2           Q       So let me show you Pappan 11. Have you  
3 seen this article or a summary of this article or an  
4 article about this article before?

5                   MR. WALLACE: Objection; compound.

6                   THE WITNESS: I believe so.

7           Q       (By Mr. Raskopf) Okay. So you think  
8 you've read this?

9                   MR. WALLACE: Objection.

10          Q       (By Mr. Raskopf) I'm asking if you've  
11 read this before?

12          A       I believe so.

13          Q       Okay. And is it -- this article refers to  
14 a poll on the second page, a recent SI poll, go down  
15 to the -- go to page -- the second page, says Page 2  
16 of 5, see at the top?

17          A       Yes.

18          Q       Go down to the second to last paragraph,  
19 and you read the first sentence of the second to  
20 last paragraph into the record beginning with the  
21 word "Indeed."

22          A       Yes.

23          Q       Go ahead.

24                   MR. WALLACE: He just wants you to read  
25 it.

1           Q       (By Mr. Raskopf)   Just read it into the  
2       record.

3           A       "Indeed, a recent SI poll suggests that  
4       although Native American activists are virtually  
5       united in opposition to the use of Indian nicknames  
6       and mascots, the Native American population sees the  
7       issue far differently. Asked if high school and  
8       college teams should stop using Indian nicknames, 81  
9       percent of Native Americans responded said no. As  
10      for pro sports, 83 percent of Native American  
11      responses said teams should not stop using Indian  
12      nicknames, mascots, characters, and symbols."

13                 MR. WALLACE:   He just wanted you to read  
14      the first sentence.

15           Q       (By Mr. Raskopf)   That's fine. Do you  
16      have any poll of Native Americans that suggests  
17      otherwise?

18           A       No.

19                 MR. WALLACE:   Object.

20           Q       (By Mr. Raskopf)   Are you aware of any  
21      poll of Native Americans that suggest otherwise?

22                 MR. WALLACE:   Objection; asked and  
23      answered.

24                 THE WITNESS:   No.

25           Q       (By Mr. Raskopf)   All right. And you

1 consider yourself an activist; right?

2 A Yes.

3 MR. RASKOPF: I think we can take a break  
4 now and let's -- it's almost noon.

5 (Lunch break was taken from 11:57 to 12:59)

6 (Exhibit Tsotigh Number 3 marked for  
7 identification and made part of the  
8 record)

9 Q (By Mr. Raskopf) Please take a look at  
10 the Response to Request for Production 1, which is  
11 Tsotigh 3. If you turn to the -- Page 15, you see  
12 it's dated July 14, 2010. On the left side, it says  
13 July 14, 2010. Let me just ask you a question, do  
14 you remember seeing Courtney Tsotigh's Response to  
15 Respondent's First Request for Production of  
16 Documents, this document, do you remember seeing it?

17 A Yes.

18 Q Okay. And you reviewed it before you --  
19 you reviewed it when you saw it?

20 A Yes.

21 Q And there's nothing in here that is  
22 inaccurate, as far as you know?

23 A As far as I know.

24 Q All right. So truthful information, to  
25 the best of your knowledge?

1           A     Yes, sir.

2                     (Exhibit Tsotigh Number 4 marked for  
3                     identification and made part of the  
4                     record)

5           Q     (By Mr. Raskopf)   And let's look at the  
6     Response to Request for Production 2, which is  
7     Exhibit 4.

8           A     Okay.

9           Q     Courtney Tsotigh's Response to  
10    Respondent's Second Request for Production of  
11    Documents and things.  If you turn to the -- to Page  
12    5, you'll see it's dated September 3, 2010?

13          A     Yes.

14          Q     And you saw this before it was submitted?

15          A     Yes, sir.

16          Q     You read it?

17          A     Yes, sir.

18          Q     And everything in here is fair and  
19    accurate, to the best of your knowledge; right?

20          A     Yes, sir.

21                     (Exhibit Tsotigh Number 5 marked for  
22                     identification and made part of the  
23                     record)

24          Q     (By Mr. Raskopf)   All right.  And same  
25    thing for Exhibit 5, which is your -- which is

1 petitioner Courtney Tsotigh's Response to  
2 Respondent's First Set of Interrogatories, do you  
3 see that?

4 A Yes, sir.

5 Q And you keep calling me, sir, I feel a  
6 little old when you do that, but it's okay, it's up  
7 to you. Page 15, you'll see your response is dated  
8 July 14, 2010; is that correct?

9 MR. WALLACE: Which page you on?

10 MR. RASKOPF: 15 of Exhibit 5. Do I have  
11 that wrong? Yes, I do have that wrong. We are on  
12 Page 19, sorry, of Exhibit 5.

13 MR. WALLACE: Sorry, is there a question  
14 pending?

15 Q (By Mr. Raskopf) Yes. You see the date,  
16 September 3rd, you remember seeing this, these  
17 responses to our first set of interrogatories on or  
18 around September 3, 2010?

19 A Yes.

20 Q And you reviewed these responses before  
21 they were sent to us; right?

22 A Yes, sir.

23 Q And they are fair and accurate, to the  
24 best of your knowledge?

25 A Yes, sir.

1           Q     Nothing in here is misleading or a  
2     misrepresentation, as far as you know?

3           A     As far as I know.

4           Q     Is there anything in here false?

5           A     No.

6           Q     No, nothing in here is false; right?

7           A     Nothing in here is false.

8           Q     Okay. Thank you.

9           MR. RASKOPF: We don't have a verification  
10    for these responses, Counsel. We would like to have  
11    one.

12          MR. WALLACE: I thought that it had been  
13    sent to you, but we can certainly follow up on that.

14          MR. RASKOPF: We have not received one, to  
15    the best of my knowledge.

16          MR. WALLACE: Okay.

17          MR. RASKOPF: Even more importantly, we  
18    have not received one to the best of Mr. Anten's  
19    knowledge.

20          MR. WALLACE: I can follow up with you on  
21    that.

22          MR. ANTEN: Unless it was produced  
23    separately.

24          MR. WALLACE: Okay.

25          Q     (By Mr. Raskopf) You remember this

1 morning we discussed the documents that you produced  
2 from your e-mail accounts? Yes or no, you remember  
3 that?

4 A Yes, sir.

5 Q All right. We discussed the subject  
6 generally, and you said you may have deleted some  
7 e-mails from those accounts that related to this  
8 case; correct?

9 A (Nods head) .

10 MR. WALLACE: Make sure you answer  
11 verbally.

12 THE WITNESS: Yes.

13 Q (By Mr. Raskopf) All right. Now, are you  
14 aware that you did not send us a single e-mail from  
15 any sent account of yours?

16 A No, I'm not aware of that.

17 Q So there's not -- as far as -- we did not  
18 receive a single sent e-mail that you sent to  
19 someone else.

20 A Uh-huh.

21 Q As far as the production you made to us.  
22 Can you think of a specific sent e-mail that you did  
23 give us?

24 A I can't recall any.

25 Q All right. What explanation do you have

1 for having deleted all of your sent e-mails that  
2 relate to this case from any account?

3 MR. WALLACE: Object as mischaracterizing.  
4 You can go ahead and answer.

5 THE WITNESS: I don't recall deleting my  
6 sent items, at the same time, I don't recall sending  
7 too many e-mails on the subject matter.

8 Q (By Mr. Raskopf) Do you recall ever  
9 sending any e-mails?

10 A Not specifically, no.

11 Q Okay. So when -- weren't you asked to  
12 provide some information including, for example,  
13 your belief that you were disparaged by the use of  
14 the trademark Washington Redskins to Suzan Harjo  
15 and/or the attorneys for the petitioners?

16 A I don't know, I don't think so. Not that  
17 I can recall.

18 Q You don't think you ever replied to any  
19 e-mail that anybody sent you that related to this  
20 case?

21 A I don't know, I don't remember.

22 Q Do you have a habit of not replying to  
23 anyone's e-mails as a general rule?

24 A Not as a general rule, I just have a habit  
25 of not responding to e-mails.



1           Q     Whether or not you're asked to respond to  
2     them?

3           A     I'll respond to them maybe by a phone call  
4     of some sort or other communication, I don't know.

5           Q     You're saying that it's your practice that  
6     when you receive an e-mail that requires a response,  
7     the general rule for you is not to hit the reply  
8     button, but to pick up the phone and call somebody?

9           A     No, I'm just -- I -- I don't know, I just  
10    don't -- I don't purposefully not respond, it's just  
11    maybe I had not responded by e-mail.

12          Q     Well, once in a while from time to time  
13    you also must delete sent e-mails as well; right?

14          A     Sorry?

15          Q     From time to time once in a while you must  
16    also delete sent e-mails; correct?

17          A     Possibly, but I don't know that I  
18    necessarily make a point to go delete my sent items.

19          Q     I want to show you Blackhorse Exhibit 2.  
20    Do you know anything about Haskell Indians Indian  
21    Nation University?

22          A     A little bit.

23          Q     What do you know about it?

24          A     I know that my grandmother went there.

25          Q     On your father's side?

1           A     On my father's side. I know my brother  
2     went there.

3           Q     Okay. When did he graduate?

4           A     He never graduated.

5           Q     Okay. When did he attend?

6           A     Probably maybe 2000, somewhere around  
7     there, I'm not for sure.

8           Q     This is your brother who is seven years  
9     older than you are?

10          A     Eight years.

11          Q     Eight years, okay. And you know Haskell  
12     Indian Nation University to be a Native American  
13     university?

14          A     Yes, sir.

15          Q     100 percent or virtually 100 percent  
16     Native Americans; right?

17          A     Yes.

18          Q     Who populate the school?

19          A     Yes.

20          Q     And you know that the logo I'm showing you  
21     is the logo of Haskell; right?

22          A     Yes.

23          Q     And you've seen it before?

24          A     Yes.

25          Q     Plenty of times?

1 A Yes.

2 Q It's in your house?

3 A No.

4 Q Well, when your brother was going there,  
5 was it in your parents' house?

6 A I don't know. I don't remember.

7 Q Is he the guy who's the Cowboys fan?

8 A The Vikings.

9 Q Vikings fan?

10 A Yes.

11 Q That's right, your father was the Cowboys  
12 fan. And so would he have a habit of wearing  
13 Haskell Indian Nations University paraphernalia from  
14 time to time?

15 MR. WALLACE: Objection; vague. You  
16 asking about the brother?

17 Q (By Mr. Raskopf) Brother.

18 A Yes, he played basketball for them, so he  
19 probably would have.

20 Q Okay. So this logo was undoubtedly in  
21 your house, your parents' house from time to time;  
22 right?

23 MR. WALLACE: Objection; asked and  
24 answered.

25 Q (By Mr. Raskopf) Yes or no?

1           A     Probably, yeah.

2           Q     What's the nickname of the Haskell  
3 University?

4           A     Indians.

5           Q     You're not asking me, you're telling me,  
6 aren't you?

7           A     Yes.

8           Q     Because you know that?

9           A     Indians or the Warriors.

10          Q     Okay. It's either Indians or Warriors?

11          A     Uh-huh.

12          Q     Now, before you said that the Florida  
13 Seminole logo was objectionable to you, even though  
14 it was approved by Florida Seminoles, is this logo  
15 objectionable to you?

16          A     I would say not so much as the Florida --

17          Q     Seminoles.

18          A     -- Seminoles or even the Redskins.

19          Q     Okay. And why not?

20          A     Because their population represents the  
21 majority of Native Americans, if not all.

22          Q     So it's not the logo, but it's the group  
23 of -- it's the racial identity of the group who  
24 plays under the logo that bothers you more?

25          A     Not necessarily. In this sense, it

1 doesn't bother me as much.

2 Q Doesn't bother you because the school is  
3 mostly Native Americans?

4 A Uh-huh.

5 Q So that means -- and the Washington  
6 Redskins aren't made up of mostly Native Americans;  
7 right?

8 A I mean, it's not either/or, it's  
9 accumulation of all various different things that  
10 bothers me about Native Americans as mascots, as a  
11 symbolism in sports.

12 Q Well, if the Washington Redskins helmet  
13 logo became the logo of Haskell Nations University  
14 and the Haskell Nations University logo became the  
15 logo of the Washington Redskins, you would then say  
16 that the Washington Redskins, the old Washington  
17 Redskins' logo now used by Haskell is less offensive  
18 to you than the logo that Haskell is now using;  
19 right?

20 A No.

21 Q Okay. Then I guess I don't understand  
22 what you're saying.

23 A I'm saying that it's not either/or, I'm  
24 saying that it's not just because the logo, it's not  
25 just because the representation of a college of

1     their population or the representation of a football  
2     team, I'm saying what's represented, what's  
3     misrepresented is that this logo --

4           Q     Referring to the Haskell logo?

5           A     Referring to the Haskell logo, the  
6     Redskins logo, referring to the Redskins logo, the  
7     Seminole State Florida logo, referring to the  
8     Seminole State Florida, that all of them are a  
9     misrepresentation of who Native American people are.  
10    And they are misrepresenting what some Native  
11    Americans continue to still hold on to, which is  
12    traditions, which is some of these war bonnets,  
13    their identity, some of those things that Native  
14    Americans still hold on to that is represented in  
15    these logos set out for society to see that, to see  
16    that logo as who Native American people are.

17          Q     So if this was taken from a Native  
18    American art gallery, the Haskell Indian Nations  
19    University logo, and it was actually a drawing of an  
20    actual Native American who lived here in 1600, and  
21    he looked just like this, then it wouldn't bother  
22    you; is that right? Because it would be historic  
23    imagery; right?

24          A     I think on some levels, it would still  
25    bother me because the nature of sports and the field

1 of competition that is represented.

2 Q Okay. And you think that using say, for  
3 example, Redskins sends a wrong message about Native  
4 Americans in sports?

5 A Not just in sports.

6 Q My question is still in front of you.

7 MR. WALLACE: She answered the question,  
8 Counsel.

9 MR. RASKOPF: Okay. Will you read that  
10 back?

11 COURT REPORTER: "Not just in sports."

12 Q (By Mr. Raskopf) Okay. So Redskins means  
13 things not just in sports, but also out of sports  
14 that bothers you; is that right?

15 A Yes.

16 Q Okay. Mark this 6.

17 (Exhibit Tsotigh Number 6 marked for  
18 identification and made part of the  
19 record)

20 Q (By Mr. Raskopf) This is Union Public  
21 Schools' website; right?

22 MR. WALLACE: Objection; foundation. Are  
23 you representing that this is Union Schools?

24 Q (By Mr. Raskopf) I'm asking you, you know  
25 what Union Public Schools are; right? There's Union

1 High School?

2 A Tulsa Union High School.

3 Q Tulsa Union High School, and Tulsa Union  
4 High School, the nickname of the high school is the  
5 Redskins; right?

6 A Yes.

7 Q And you know that?

8 A Yes.

9 Q And you've known that for many years;  
10 right?

11 A Yes.

12 Q Okay. And so do Native Americans attend  
13 Union High School?

14 A Probably, I don't know.

15 Q Probably some; right?

16 A Yeah.

17 Q But not all; right?

18 A Right.

19 Q And you see the first and second paragraph  
20 of this Union Public School website? You see where  
21 it says, "Say the word Redskin and you picture a  
22 group pulling together to create an everlasting  
23 bond," do you see that?

24 A Yeah.

25 Q And then the next sentence says, "This



1 group comes from all directions in the academic,  
2 athletic, extracurricular activity, and scholastic  
3 disciplines," do you see that?

4 A Yeah.

5 Q Then it says, "Say the word Redskin and  
6 you picture a never-say-die warrior who is the first  
7 in all our history, a brave and sturdy chief who  
8 looks after what he has and is eager to take on and  
9 concur what is in the future."

10 A Yeah.

11 Q Now, you think that is derogatory to  
12 Native Americans?

13 A I look at that and question what's their  
14 source to -- of this redskin.

15 Q No, I want an answer to my question, yes  
16 or no, do you think that that paragraph negatively  
17 disparages Native Americans?

18 I'd just like the record to reflect the  
19 passage of time, it's been approximately 45 seconds  
20 by my calculation since I put the question, you  
21 still don't have an answer to it.

22 A I think the paragraph here isn't -- even  
23 though it's not saying -- you know, relating it  
24 directly to Native Americans, that -- that it's --  
25 how should I say this, yes, it is.

1           Q     So your answer is that the use of the word  
2 "redskin" in this paragraph disparages the Native  
3 Americans?

4           A     Yes, the word "redskin" disparages Native  
5 Americans.

6           Q     In this paragraph, not asking about  
7 outside of this paragraph, I'm asking about a  
8 specific reference or use of the word "redskin."

9           A     I think any use of the word "redskin" is  
10 disparaging to Native Americans, no matter what kind  
11 of context that somebody, a public school, an NFL  
12 team, any person tries to flip the picture around to  
13 make it say what they want to say.

14          Q     So you're saying that the word "redskin"  
15 in this paragraph, as used here, disparages Native  
16 Americans; right?

17          A     Yes.

18          Q     And that's your testimony and that's what  
19 you're sticking to; right?

20          A     Yeah.

21               MR. WALLACE:  Objection; asked and  
22 answered.

23          Q     (By Mr. Raskopf)  So let's take it  
24 sentence by sentence.  "Say the word Redskin and you  
25 picture a group pulling together to create an

1     everlasting bond," how does that disparage Native  
2     Americans?

3             A     The word "redskin."

4             Q     What do you mean the word "redskin," I  
5     asked how it's used, you mean to say no matter how  
6     it's used, it automatically disparages Native  
7     Americans?

8             A     Well, taking Union Public Schools, you  
9     take what's being said, and then I'm sure you have a  
10    logo on here or wherever the logo is and put it to  
11    this, then, yes, I feel it's disparaging.

12            Q     That's not what I asked you, no, that's  
13    not what I asked you. I didn't say to pull anything  
14    else in, I said, let's look at the sentence standing  
15    alone and you tell me how the sentence, "Say the  
16    word Redskin and you picture a group pulling  
17    together to create an everlasting bond," how that  
18    sentence disparages Native Americans, which I  
19    understand to be your testimony.

20            MR. WALLACE: Objection; asked and  
21    answered.

22            THE WITNESS: Well, I can't separate  
23    myself from the word "redskin," so, yes, I feel that  
24    that is disparaging to Native Americans.

25            MR. RASKOPF: Would you read that back?

1 COURT REPORTER: "Well, I can't separate  
2 myself from the word 'redskin,' so, yes, I feel that  
3 that is disparaging to Native Americans."

4 Q (By Mr. Raskopf) So wherever you see the  
5 word "redskin" used in any sentence, you can't  
6 separate yourself from it and believe, therefore,  
7 that that word, no matter how used, disparages  
8 Native Americans?

9 A I can't separate myself from knowing that,  
10 you know, what I know, which is what I know about  
11 this school and about the mascot that they have, all  
12 of that.

13 Q Okay. When was the school founded, do you  
14 know?

15 A No.

16 Q It was founded before you were born;  
17 right?

18 A Yes.

19 Q They had a mascot, they had a team they  
20 called Redskin long before you were born; right?

21 MR. WALLACE: Objection; foundation.

22 Q (By Mr. Raskopf) Right?

23 A Yes.

24 Q And, yet, you say that the way they have  
25 used it historically is something that disparages

1 you when you weren't even born when they started  
2 using it, is that your testimony? I just want to  
3 understand your testimony.

4 A Yes.

5 Q Okay. Just want to be clear this is your  
6 testimony, is it your testimony that the following  
7 disparages Native Americans, from the same  
8 paragraph, "Say the word Redskin and you picture a  
9 never-say-die warrior who is the first in all our  
10 history, a brave and sturdy chief who looks after  
11 what he has and is eager to take on and concur what  
12 is in the future," that sentence disparages Native  
13 Americans; correct?

14 MR. WALLACE: Objection; asked and  
15 answered.

16 THE WITNESS: Yes.

17 Q (By Mr. Raskopf) Did you ever complain to  
18 Union Public Schools about their use of the term  
19 "Redskins"?

20 A No.

21 Q Or their mascot, which you seem to be  
22 fully aware of?

23 A No.

24 Q You never complained about their mascot,  
25 either, huh?

1           A     No.

2           Q     Did you know that Union High School Board  
3 of Education convened a special meeting to discuss  
4 whether they should keep Redskins mascot and the  
5 name?

6           A     Yes, I heard about it.

7           Q     Do you know -- remember when that was?

8           A     No.

9           Q     Well, I represent to you that it was in  
10 2003, so you were 16 years old at that time.

11          A     Right.

12          Q     And when did you hear about it? Actually,  
13 you were 17, it was late in 2003, but when did you  
14 first hear about it?

15          A     Probably about 2004.

16          Q     Have you ever read any articles about  
17 this?

18          A     No.

19          Q     Have you read any articles in which the  
20 president of the Union Public Schools Board of  
21 Education was quoted as saying, "It has been  
22 important for me to note that these organizations  
23 that exist to promote the interest of Native  
24 American students in our district have not come  
25 forward to protest the district's continued use of

1 the Redskins mascot," did you ever see that  
2 statement before?

3 A Possibly, I don't remember.

4 Q How far is Union from your father's high  
5 school, geographically?

6 A Probably about two and a half hours.

7 Q And does his school and this school get  
8 together at state meetings and such, as far as you  
9 know?

10 A I don't know.

11 Q Do you know Scott McDaniel?

12 A No.

13 Q Does your father?

14 A I don't know.

15 Q Do you consider the fact that this was  
16 brought in a public forum and people were asked to  
17 decide what they wanted to do with that nickname and  
18 decided not to change it, do you consider that at  
19 all as a factor in determining whether you think  
20 it's appropriate to proceed with your petition  
21 against the Washington Redskins?

22 A No.

23 Q Have you seen the registrations of the  
24 Washington Redskins, the federal registrations of  
25 the Washington Redskins, the certificates of

1 registration?

2 A I can't remember.

3 Q I'll show you the documents that have been  
4 previously marked Gover 3 through 8, tell me if  
5 you've seen them before.

6 A So are you asking if I've seen like --

7 Q Those certificates of registration prior  
8 to today.

9 A I can't remember if I have or not.  
10 Something tells me that I have now.

11 Q But as you sit here, you don't remember?

12 A I don't remember.

13 Q But it really wouldn't matter because any  
14 use of redskin as far as you're concerned, no matter  
15 what, no matter how, no matter what circumstances  
16 disparages Native Americans; right?

17 A Yes.

18 Q Okay. So it could say Washington loves  
19 redskins and that would disparage Native Americans;  
20 right?

21 A Yes.

22 Q Okay. I think you said -- have you ever  
23 had a conversation with Mr. Gover?

24 A I don't think so, I don't know.

25 Q Never talked to him, you have not talked



1 to him at all?

2 A (Shakes head).

3 Q E-mailed him?

4 A I don't think so.

5 Q You know he's a petitioner?

6 A Yes.

7 Q Right? He's signed the same document,  
8 same petition you did?

9 A I know.

10 Q Right? And you haven't ever talked to  
11 him?

12 A No.

13 Q Have you talked to any of the other  
14 petitioners?

15 A Yes.

16 Q Which one?

17 A Marcus Clouds.

18 Q Marcus Briggs-Cloud?

19 A Briggs-Cloud.

20 Q And that's it?

21 A Yes.

22 Q Okay. When did you speak to Marcus?

23 A I speak to him off and on occasionally.

24 Q What, are you friends or --

25 A Yes.

1 Q Does he live near you?

2 A I don't know.

3 Q So you exchange e-mails?

4 A Not so much e-mails.

5 Q Have you ever sent him an e-mail?

6 A Probably.

7 Q Yet you didn't produce a single e-mail  
8 either received by you or sent by you to Marcus  
9 Briggs-Cloud in connection with this case, you're  
10 aware of that?

11 A Yes, but it may have been on my school  
12 e-mail. It probably wasn't pertaining to the case  
13 that the e-mail was sent.

14 Q Well, did you show that e-mail to or from  
15 Marcus Briggs-Cloud to anyone in order to determine  
16 whether it should be produced in this case or did  
17 you just decide that on your own that it shouldn't  
18 be produced?

19 MR. WALLACE: Going to object, instruct  
20 you not answer to the extent that it would reveal  
21 communication with your attorney. If you can answer  
22 in a way that would not reveal a communication with  
23 your attorney, then go ahead.

24 Q (By Mr. Raskopf) Withdrawn. Did you  
25 decide unilaterally that e-mails to or from Marcus

1 Briggs-Cloud and you didn't have anything to do with  
2 this case?

3 A I couldn't access the e-mails because they  
4 were on the e-mail that I haven't been able to  
5 access through the school, the college e-mail, so if  
6 there was any e-mail sent, they probably would have  
7 been sent through that school address.

8 Q Well, that one shut down a while ago,  
9 though; right?

10 A Right.

11 Q You're still in contact with Briggs-Cloud,  
12 are you not?

13 A Yes, by phone.

14 Q Okay. So now only by phone?

15 A Text messaging.

16 Q Do you make copies of text messages that  
17 you sent back and forth to Mr. Briggs-Cloud?

18 A No, we're friends.

19 Q Were you ever advised to save text  
20 messages?

21 A No.

22 Q Well, you were told a year ago that you  
23 were supposed to save documents; right? Or that's  
24 when you first became aware of your duty to preserve  
25 information; right?

1           A     Yes.

2           Q     Since then, have you preserved your text  
3 messages to and from Marcus Briggs-Cloud?

4           A     No.

5           Q     When did you first start exchanging  
6 e-mails with Mr. Briggs-Cloud?

7           A     I don't know, probably -- we don't --  
8 maybe 2007, 2000 -- somewhere around there maybe,  
9 but I don't specifically recall.

10          Q     Okay. So it was after the case was filed,  
11 after your case was filed in August of 2006; right?

12          A     Yes.

13          Q     And you must have used your non-university  
14 accounts to e-mail to and from him from time to  
15 time, did you not?

16          A     I don't know.

17          Q     You don't remember or you don't know or  
18 what?

19          A     I don't remember.

20          Q     Okay. Give me an example of something  
21 that you said to Marcus Briggs-Cloud and that he  
22 said to you in all of these e-mails.

23          A     Hi, how is it going, how is your family  
24 doing. It's not about the case. Our communication  
25 goes beyond the petition.

1 Q Every time?

2 A Yes.

3 Q Okay. You say that all your communication  
4 with Mr. Briggs-Cloud occurred over your university  
5 e-mail account?

6 MR. WALLACE: Objection;  
7 mischaracterization.

8 THE WITNESS: That I can recall, I  
9 don't -- I don't recall, I really don't recall being  
10 in contact with him too much by e-mail. Now, other  
11 forms of communication, probably.

12 Q (By Mr. Raskopf) But there were contacts  
13 that you did have with him via e-mail; right?

14 A I don't know because I can't access that  
15 account, I don't know for sure, so I don't remember,  
16 I don't know.

17 Q You can't access that account now; right?

18 A Right.

19 Q But you did say that you knew that your  
20 access to that account was going to be suspended?

21 A Right.

22 Q And when you learned that, you took the  
23 information that you had in that account and  
24 transferred it to another account of yours to  
25 preserve it; right?

1           A     Not very much of it, just mostly school  
2 stuff.

3           Q     Just what you decided --

4           A     Yes.

5           Q     -- to preserve?

6           A     Yes.

7           Q     Right?

8           A     Yes.

9           Q     And you didn't preserve any of your  
10 exchanges with Mr. Briggs-Cloud, did you?

11          A     No.

12          Q     Okay. Have you ever had any conversations  
13 with Mr. Gover?

14               MR. WALLACE: Objection; asked and  
15 answered. You can answer.

16               THE WITNESS: I don't recall, no.

17          Q     (By Mr. Raskopf) All right. Did you  
18 ever -- do you know whether Mr. Gover uses the word  
19 "redskins" in private conversation?

20          A     I don't know.

21          Q     So if I had a document which he wrote on  
22 someone else's Facebook wall, "Don't sew up the  
23 Redskins' O line," or "seal up the Redskins' O  
24 line," doesn't really matter if it says sew or seal,  
25 he was using Redskins to refer to the Washington

1 Redskins, O being offensive line.

2 A Okay.

3 Q That wouldn't bother you; right?

4 A I don't know what that is referring to.

5 Q Well, let's say he was referring to the  
6 offensive line of the Washington Redskins when he  
7 wrote to his friend, "Don't seal up that Redskins' O  
8 line," would that trouble you?

9 A Not necessarily, I don't know, no, I guess  
10 not.

11 Q It doesn't trouble you that he could  
12 conceive of a way of using Redskins without  
13 disparaging anyone and you could not?

14 MR. WALLACE: Objection; vague.

15 THE WITNESS: Can you repeat that?

16 COURT REPORTER: "It doesn't trouble you  
17 that he could conceive of a way of using Redskins  
18 without disparaging anyone and you could not?"

19 MR. WALLACE: Objection; lack of  
20 foundation.

21 THE WITNESS: I don't know.

22 Q (By Mr. Raskopf) You don't know if that  
23 bothers you or not?

24 A I mean, that, what he was saying, I mean,  
25 no, it doesn't really -- he's obviously talking

1 about a football game, I don't know.

2 Q He's talking about a football team.

3 A Okay.

4 Q Washington Redskins. And that -- so for  
5 that reason, it doesn't bother you?

6 A That's not what I'm saying. I'm just  
7 saying whatever he's talking about, he's talking  
8 about the game, whatever he's -- I don't know what  
9 he's talking about, I don't know.

10 Q Well, whenever the Washington Redskins use  
11 the term "Washington Redskins," they're --

12 A I don't like the word the "Washington  
13 Redskins," it's offensive to me, it's offensive to  
14 who I am, who -- what Native Americans are that  
15 still have -- practice their tribal ceremonies and  
16 traditions and customs, and that's how I feel about  
17 it. I don't -- it's offensive, the word "Redskins,"  
18 whenever it is representative of a mascot is  
19 offensive.

20 Q Right. So what you're saying is, you  
21 don't like how Gover used it, right, because it's  
22 offensive?

23 A How he's using it's not offensive, he's  
24 talking about an offensive line in a game, I don't  
25 know.



1           Q     Right. That particular use is not  
2     offensive to you, okay. What if one of your other  
3     fellow petitioners used the word "skins" in  
4     conversation with another fellow petitioner, would  
5     that bother you?

6           A     I don't know the context that they're  
7     using it in.

8           Q     Okay. I'll show it to you, show you  
9     Blackhorse 8. So this came out of Amanda  
10    Blackhorse's e-mail account, and it's an e-mail from  
11    Shquanebin Lone-Bentley to Amanda Blackhorse, and  
12    underneath that e-mail is another e-mail dated  
13    Monday, August 21st, 2006, at 12:55, and then  
14    underneath that is another e-mail from Shquanebin  
15    Lone-Bentley that says, "Must be something about the  
16    Southeastern Skins, laugh out loud," do you see  
17    that?

18          A     Yep.

19          Q     Does that offend you that Shquanebin  
20    Lone-Bentley is using the words "Southeastern Skins"  
21    in addressing Amanda Blackhorse?

22          A     I think the term "skins" and "Redskins,"  
23    just skins, I think, is used amongst Native American  
24    or amongst different various people as a, you know,  
25    they don't -- I guess maybe don't know the context

1 of it, of how they're using it and how it's  
2 become -- how it's became known or used, its usage.  
3 And so I mean, does it bother me, a little bit, it  
4 bothers me in the fact that, you know, maybe they're  
5 not knowledgeable of that, maybe they've been  
6 conditioned to refer to themselves or others as  
7 skins, so I mean, I've heard it used, I mean, I  
8 think that -- that's, you know.

9 Q You recognize that Lone-Bentley and  
10 Blackhorse are both petitioners in this case?

11 A Yes.

12 MR. WALLACE: No, Lone-Bentley is no  
13 longer a petitioner in the case.

14 Q (By Mr. Raskopf) Was a petitioner in this  
15 case. When this was written, she was a petitioner?

16 A Right.

17 Q And so they don't have a sufficient  
18 understanding of the context of it or how they're  
19 using it, in your view; is that right?

20 MR. WALLACE: Object for lack of  
21 foundation. You can answer.

22 Q (By Mr. Raskopf) I'm just reading back  
23 what you stated.

24 MR. WALLACE: Same objection.

25 THE WITNESS: That's my thoughts.

1 MR. RASKOPF: Okay.

2 MR. WALLACE: You need a break, you okay?

3 THE WITNESS: I'm okay.

4 MR. WALLACE: Counsel, if you don't mind,  
5 I'd like a short break.

6 MR. RASKOPF: Sure.

7 (Break taken from 1:49 to 1:56)

8 (Defendant's Exhibit Number 7 marked for  
9 identification and made part of the  
10 record)

11 Q (By Mr. Raskopf) Ask the reporter to mark  
12 this 7. Have you read this document before?

13 A Yes.

14 Q What is it?

15 A It's a interview or a article from the  
16 Daily Oklahoman just talking about the petition and  
17 representing -- I guess not -- quoting me from it.

18 Q Right. You remember being interviewed for  
19 this?

20 A Uh-huh.

21 Q It's dated August 12, 2006?

22 A Yes.

23 Q Just the day, I guess, after the petition  
24 was filed?

25 A Uh-huh.

1           Q     And if you turn to the second to last  
2 paragraph of this article, it says, "For Tsotigh,  
3 the fight is personal, her father John is an  
4 assistant principal at Capitol Hill High School," do  
5 you see that?

6           A     Yes.

7           Q     Now, earlier you told us that in 2006 your  
8 father was a teacher at Capitol Hill High School,  
9 but he was not a principal. Does this refresh your  
10 recollection as to whether your father was also a  
11 principal at Capitol Hill High School in 2006?

12               MR. WALLACE: You mean the assistant  
13 principal; right?

14           Q     (By Mr. Raskopf) Yeah, assistant  
15 principal.

16           A     Yeah.

17           Q     So he was a principal, assistant  
18 principal, at least, at Capitol High School, Capitol  
19 Hill High School, when you filed the petition?

20           A     Yes.

21           Q     That is your recollection now?

22           A     Now, after being refreshed.

23           Q     Right. Has anyone ever told you  
24 personally that they felt that the term "Washington  
25 Redskins" for Professional Football Services was

1       disparaging to Native Americans?

2           A       Yes.

3           Q       Who?

4           A       My -- well, Jacob Tsotigh.

5           Q       That's your uncle?

6           A       Right.

7           Q       He's an activist; right?

8           A       Yeah.

9           Q       Who else?

10          A       A guy named Chebon Kernell.

11          Q       I'm sorry, what's that fellow's name?

12          A       Chebon Kernell.

13          Q       Can you spell that?

14          A       K-E-R-N-E-L-L, C-H-E-B-O-N.

15          Q       Who is he?

16          A       Who is he?

17          Q       Yeah, how do you know him?

18          A       He's affiliated with the Methodist Church.

19       I know him because he's the pastor at the church  
20       that my membership is held at.

21          Q       Okay. Is he a classmate of yours?

22          A       No.

23          Q       Is he Native American?

24          A       Yes.

25          Q       Anyone else?

1           A       Not that I can think of.

2           Q       Has anyone ever called you a redskin?

3           A       Not that I'm aware of.

4           Q       So no one's ever said, hey, you redskin  
5 person, whatever?

6           A       No.

7           Q       Have you ever seen anyone in your presence  
8 call anyone else a redskin?

9           A       I don't think so.

10          Q       Okay. I show you Blackhorse 9 for  
11 identification. And have you ever seen that before?

12          A       I think so.

13          Q       When is the first time you saw that?

14          A       I don't remember.

15          Q       Well, you must have seen it about the time  
16 it was dated, did you not?

17          A       Was that a question?

18          Q       Yeah.

19          A       Sorry, I didn't hear it.

20          Q       Just give me a moment. In there is six  
21 questions that Ms. Harjo asked; right?

22          A       Okay.

23          Q       Did you respond to that e-mail?

24          A       I can't remember if I did, but --

25          Q       So it's dated May 7th, which is prior to

1 the filing of the petition, May 7, 2006?

2 A Uh-huh.

3 Q Suzan Harjo, who's not a petitioner in  
4 your case?

5 A Right.

6 Q Asked you about these questions; right?

7 MR. WALLACE: Objection.

8 Q (By Mr. Raskopf) It says, "If he's  
9 correct, please answer these questions"?

10 MR. WALLACE: Where are you looking,  
11 Counsel?

12 Q (By Mr. Raskopf) Okay. Do you have  
13 Blackhorse 9 in front of you?

14 A Yes.

15 Q And Blackhorse 9 is an e-mail from Suzan  
16 Harjo to Amanda Blackhorse; right?

17 A Correct.

18 Q And -- oh, I see, so Amanda Blackhorse is  
19 being asked about this by Suzan Harjo?

20 A Right.

21 Q But you've seen this, also; right? You  
22 got one like this?

23 A I think so.

24 Q Okay. And did you fill it out?

25 A I can't remember, but --

1 Q But what?

2 A I think I did, I remember seeing it.

3 Q You must have; right?

4 A Yeah.

5 Q But you didn't produce it?

6 A No.

7 Q We don't have a copy of your answers to  
8 these questions, nor do we have a copy of this  
9 e-mail from Suzan to Blackhorse addressed to you by  
10 Suzan?

11 A Uh-huh.

12 MR. WALLACE: Is that a question, Counsel?

13 Q (By Mr. Raskopf) Well, I don't have one,  
14 do you remember sending me one of these?

15 A No.

16 Q Addressed to you?

17 A Not sending one to you.

18 Q Were you in college at this time?

19 A Nope.

20 Q Okay. So your Coco mail address would  
21 have been the one you were using; right?

22 A No -- well, I don't remember, maybe,  
23 either that one or the Courtney Tsotigh.

24 Q It wasn't the one that you lost the  
25 documents?



1           A     It wasn't the college one.

2           Q     Because they changed the server or  
3     whatever; right?

4           A     Right.

5           Q     So do you believe, based on what you see  
6     here, that you received an e-mail like this from  
7     Suzan Harjo, except it was addressed to you, would  
8     have been around the same time as this one addressed  
9     to Amanda Blackhorse in Blackhorse Exhibit 9, that  
10    you responded to it, and that you deleted both the  
11    e-mail from Harjo to you and your e-mail from you to  
12    Harjo?

13                   MR. WALLACE:  Objection;  
14     mischaracterization and compound.

15                   THE WITNESS:  I believe I received the  
16     e-mail.

17           Q     (By Mr. Raskopf)  Right.

18           A     I do not -- I'm sure I would have  
19     responded and it is very possible I deleted them.

20           Q     That's the most logical explanation;  
21     right?

22           A     Yes.

23           Q     And we don't have either of the e-mails?

24           A     Right.

25           Q     You didn't produce either one of them?

1           A     Right.

2           Q     And, therefore, we don't know what they  
3 say.

4                   MR. WALLACE: Is that a question, Counsel?

5           MR. RASKOPF: No, it's not, I'll withdraw  
6 it.

7           Q     (By Mr. Raskopf) So when you turned 18 on  
8 August 22, 2005, sorry -- yeah. August 22, 2005,  
9 when you turned 18, you already believed that the  
10 term "Washington Redskins" disparaged Native  
11 Americans?

12          A     Yes.

13          Q     You were familiar with the Washington  
14 Redskins franchise?

15          A     Yes.

16          Q     You had already met Suzan Harjo?

17          A     Yes.

18          Q     You knew about her case against --

19          A     Yes.

20          Q     -- the Washington Redskins?

21          A     Yes.

22          Q     And you were of sound mind and body?

23          A     I think so.

24          Q     There was nothing that physically or  
25 mentally precluded you from filing a petition, the

1 same petition you filed on the day you turned 18;  
2 right?

3 A Yes.

4 Q Okay. And yet you waited 11 months and 20  
5 days to file the petition that -- along with these  
6 other petitioners; right?

7 MR. WALLACE: Objection.

8 THE WITNESS: Yes.

9 Q (By Mr. Raskopf) There came a time, did  
10 there not, when Suzan Harjo sought to bring more  
11 Native Americans into another petition to cancel the  
12 Redskins marks, did there not?

13 MR. WALLACE: Objection; foundation.

14 Q (By Mr. Raskopf) Do you remember being  
15 contacted by Suzan Harjo about looking for even more  
16 Native American persons to become a plaintiff?

17 A Yes.

18 Q And that was in 2009?

19 A Yes.

20 Q And let me show you this document, see if  
21 you can identify it.

22 (Exhibit Tsotigh Number 8 marked for  
23 identification and made part of the  
24 record)

25 Q (By Mr. Raskopf) Number 8. You remember

1 receiving this e-mail from Suzan Harjo?

2 A Yes.

3 Q And this is addressed to two accounts of  
4 yours, EC421 and your Oklahoma University account?

5 A Yes.

6 Q So one way or the other, you would have  
7 received it; right?

8 A Yes.

9 Q Okay. And did you attempt to locate  
10 anyone for Suzan Harjo?

11 A Yes.

12 Q Who did you try to locate?

13 A Jacob Tsotigh.

14 Q A relative?

15 A The third.

16 Q Relative?

17 A Yes.

18 Q Jacob, your Uncle Jacob's son?

19 A Son.

20 Q Which would be your cousin?

21 A Yes.

22 Q And did he ultimately join a case?

23 A No.

24 Q Do you know, did you speak to him before  
25 you recommended him?

1           A     Yes.

2           Q     What did you say to him?

3           A     I think I just asked him if he was  
4 interested, I could pass his information along.

5           Q     What was his response?

6           A     Okay.

7           Q     This was in person or on the phone or text  
8 message or e-mail?

9           A     Probably in person.

10          Q     At some family gathering?

11          A     It's fair, I guess, I don't know where it  
12 would have been, I don't know where it was. It was  
13 probably -- we went to school together, so it was at  
14 school, I'm sure.

15          Q     How old is he?

16          A     He just turned 21.

17          Q     So in '09, he was 19?

18          A     Yes.

19          Q     So he might have been a little too old for  
20 this?

21          A     Yes.

22          Q     Do you know whether that was the reason  
23 that he -- according to Harjo, do you know whether  
24 that was the reason that he did not sign on to the  
25 petition or start a new petition?

1           A       I don't know.

2           Q       Did you ever recall receiving any -- how  
3 did you convey his name to Ms. Harjo?

4           A       I can't really say that I -- that I told  
5 her myself, because Marcus and I both mutually know  
6 him, so Marcus may have been the one to have done it  
7 before I did, I can't really remember if I actually  
8 followed through and passed on the information.

9           Q       You saw an e-mail where Suzan gave you  
10 credit for identifying him, did you not?

11          A       Maybe, possibly. If I did recommend him  
12 to her, then it would have been through e-mail.

13          Q       So you would have sent her an e-mail?

14          A       Yes.

15          Q       You didn't produce an e-mail to us that in  
16 which you recommended him?

17          A       Probably not.

18          Q       So you would have deleted that e-mail  
19 after you had sent it to Suzan Harjo?

20          A       Yes.

21          Q       When did you learn that Jacob, Jr., was  
22 too old to participate?

23                 MR. WALLACE: Objection; calls for legal  
24 conclusion. You can answer.

25                 THE WITNESS: I didn't know. I never knew

1 as to --

2 Q (By Mr. Raskopf) I thought you said you  
3 found out that he was not suitable because of his  
4 age for Ms. Harjo's purposes?

5 MR. WALLACE: Objection;  
6 mischaracterization.

7 THE WITNESS: I'm just reading this e-mail  
8 and he wouldn't have been old enough, I don't know  
9 what -- to the extent the communication was between  
10 him and her, and he never told me one way or the  
11 other that he was going to be on board or not.

12 Q (By Mr. Raskopf) Did you look for any  
13 other persons to fit the bill, the prescription laid  
14 out by Ms. Harjo?

15 A I don't recall, no.

16 Q You know that you didn't recommend anyone  
17 else; right?

18 A Right.

19 Q So if you had looked for anyone to be a  
20 person between 17 and soon to turn 18 disparaged by  
21 the name of the Washington football club and  
22 interested in being represented, you couldn't find  
23 anybody; right?

24 A Not at that age.

25 MR. RASKOPF: I have -- at this time, I

1 have no further questions of this witness subject to  
2 one possible question, hang on.

3 No, that's it. Subject to any further  
4 questions that may arise by virtue of production of  
5 any additional documents, I have no further  
6 questions of this witness at this time.

7 MR. WALLACE: I may have a few on direct,  
8 give me a minute. All right. I'm going to take a  
9 couple on direct.

10 CROSS-EXAMINATION

11 BY MR. WALLACE:

12 Q Ms. Tsotigh, are you a Native American?

13 A Yes.

14 Q Do you belong to a tribe?

15 A Yes, Kiowa Tribe in Oklahoma.

16 Q Can you spell that for us?

17 A K-I-O-W-A.

18 Q And when did you become a member of the  
19 tribe?

20 A When I was a baby, an infant, at the time  
21 of birth.

22 Q Ms. Tsotigh, do you consider the term  
23 "redskins" to be a derogatory term referring to  
24 Native Americans?

25 A Yes.



1           Q     Do you consider --

2                   MR. ANTEN:  Objection.

3           Q     (By Mr. Wallace)  -- the use of the term  
4     "Redskins" and the relevant marks of the Washington  
5     pro football team to be derogatory towards Native  
6     Americans?

7           A     Yes.

8                   MR. ANTEN:  Objection.

9                   MR. WALLACE:  I have no further questions.

10                  MR. RASKOPF:  Okay.

11                  (Deposition adjourned at 2:20 p.m.)

12                               \* \* \* \* \*

13

14

15

16

17

18

19

20

21

22

23

24

25

CERTIFICATE OF DEPONENT

I have read the foregoing transcript of my deposition and except for any corrections or changes noted on the errata sheet, I hereby subscribe to the transcript as an accurate record of the statements made by me.

\_\_\_\_\_  
COURTNEY TSOTIGH

SUBSCRIBED AND SWORN before and to me  
this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission expires:

## E R R A T A S H E E T

IN RE: BLACKHORSE, ET AL. V. PRO-FOOTBALL, INC.,

DATE: OCTOBER 25, 2011

PAGE	LINE	CORRECTION AND REASON
------	------	-----------------------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

(DATE)

COURTNEY TSOTIGH

C E R T I F I C A T E

STATE OF OKLAHOMA )  
 ) SS:  
COUNTY OF OKLAHOMA )

I, Karen B. Johnson, Certified Shorthand Reporter for the State of Oklahoma, certify that the above-named COURTNEY TSOTIGH was by me first duly sworn to testify the truth; that the above and foregoing deposition was taken by me in stenotype and thereafter transcribed and is a true and correct transcript of the testimony of the witness; that the deposition was taken on OCTOBER 25, 2011, at 9:25 a.m., at 20 North Broadway, Oklahoma City, State of Oklahoma; that I am not an attorney for nor a relative of any said parties, or otherwise interested in said action.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office on this 1ST day of NOVEMBER, 2011.

---

Karen Johnson, CSR #1376  
Certified Shorthand Reporter  
For the State of Oklahoma

<b>&amp;</b>	<b>18</b> 2:11 23:3,6 25:9 78:25 140:7,9 141:1 145:20	<b>2008</b> 50:20 53:4 55:1 70:5,9,10 73:2 73:4 81:25,25 86:15	<b>50/50</b> 8:16 <b>51</b> 3:10 <b>530</b> 43:10
<b>&amp;</b> 2:7,9 3:4,10	<b>19</b> 29:21 37:4 78:25 103:12 143:17	<b>2009</b> 81:25 82:2,9 91:1,1 141:18	<b>6</b>
<b>0</b>	<b>1967</b> 2:14 97:14,18 98:2,5,19	<b>2010</b> 57:9,10,15 73:2 78:1 87:18 88:20 101:12,13 102:12 103:8,18	<b>6</b> 4:3,14 113:16,17 <b>60</b> 68:2 <b>67</b> 98:21,24
<b>09</b> 143:17	<b>1974</b> 2:8,11,13 <b>1978</b> 2:6 <b>1990</b> 2:4 <b>1999</b> 35:23 36:6 <b>1:49</b> 133:7 <b>1:56</b> 133:7 <b>1st</b> 150:17	<b>2011</b> 1:17 5:7 19:4 19:14 47:12 60:15 149:3 150:11,18 <b>202</b> 3:6 <b>21</b> 143:16 <b>212</b> 3:11 <b>21st</b> 131:13 <b>22</b> 140:8,8 <b>22nd</b> 3:10 23:10 <b>230-5670</b> 3:6 <b>24</b> 97:10 <b>25</b> 1:17 2:8 19:3,14 149:3 150:11 <b>25th</b> 5:6 21:14 <b>26</b> 2:14 <b>2:20</b> 147:11	<b>7</b>
<b>1</b>	<b>2</b> 4:10 87:10,14 90:5 99:15 102:6 107:19 <b>20</b> 14:2 23:6 141:4 148:13 150:12 <b>2000</b> 59:5,5,15 73:2 74:4 108:6 126:8 <b>20005-1209</b> 3:5 <b>2001</b> 59:5 <b>2003</b> 33:19 34:18,22 34:24 35:2 120:10 120:13 <b>2004</b> 33:19,20 34:7 34:15,18,22,24 50:20 51:3 53:4 54:13 55:16,20 56:1 97:6,10 120:15 <b>2005</b> 33:20 34:7,15 59:15,24 60:13 75:6 140:8,8 <b>2006</b> 10:20 22:25 33:12,18,21 47:13 47:14,15 57:15 59:15,16,24 60:13 62:18 78:1 81:20 126:11 131:13 133:21 134:7,11 137:1 <b>2007</b> 126:8	<b>3</b>	<b>7</b> 2:6 4:9,15 133:8 133:12 137:1 <b>7th</b> 136:25
<b>1</b> 4:9 7:8 19:6 85:17 101:10 <b>1,000</b> 68:22 <b>1,085,092</b> 2:5 <b>1,606,810</b> 2:3 <b>10</b> 35:25 95:16,17 <b>100</b> 108:15,15 <b>10010</b> 3:11 <b>101</b> 4:11 <b>102</b> 4:12,13 <b>10:44</b> 62:1 <b>10:55</b> 62:1 <b>11</b> 23:5,9,17 29:3,22 35:25 37:2,18,21 86:4 99:2 141:4 <b>113</b> 4:14 <b>11:57</b> 101:5 <b>11th</b> 23:13 <b>12</b> 2:13 36:1,1,6,21 86:5 133:21 <b>12:55</b> 131:13 <b>12:59</b> 101:5 <b>13</b> 36:1,2,6,21 62:5 62:11 68:3,17 81:7 <b>133</b> 4:15 <b>1376</b> 150:20 <b>14</b> 52:8 101:12,13 103:8 <b>141</b> 4:16 <b>146</b> 4:4 <b>15</b> 101:11 103:7,10 <b>1500</b> 3:5 <b>16</b> 35:2,5 51:7 120:10 <b>1600</b> 112:20 <b>17</b> 2:4 51:2,7 56:5 120:13 145:20	<b>2</b>	<b>202</b> 3:6 <b>21</b> 143:16 <b>212</b> 3:11 <b>21st</b> 131:13 <b>22</b> 140:8,8 <b>22nd</b> 3:10 23:10 <b>230-5670</b> 3:6 <b>24</b> 97:10 <b>25</b> 1:17 2:8 19:3,14 149:3 150:11 <b>25th</b> 5:6 21:14 <b>26</b> 2:14 <b>2:20</b> 147:11	<b>8</b>
		<b>3</b>	<b>8</b> 4:16 122:4 131:9 141:22,25 <b>81</b> 100:8 <b>83</b> 100:10 <b>836,122</b> 2:14 <b>849-7000</b> 3:11 <b>87</b> 4:10
		<b>4</b>	<b>9</b>
		<b>4</b> 4:12 102:2,7 <b>4,000</b> 60:7 69:14 <b>44</b> 98:1,20 <b>45</b> 115:19	<b>9</b> 96:13,18,24 136:10 137:13,15 139:9 <b>90</b> 68:2 <b>91</b> 96:3,12,18,23 <b>92/0467,185</b> 1:8 <b>978,824</b> 2:12 <b>98</b> 35:24 <b>986,668</b> 2:9 <b>987,127</b> 2:7 <b>99</b> 35:24
		<b>5</b>	<b>a</b>
		<b>5</b> 4:13 99:16 102:12 102:21,25 103:10 103:12 <b>50</b> 8:18	<b>a.m.</b> 6:2 150:12 <b>able</b> 82:14 125:4 <b>academic</b> 115:1 <b>acceptable</b> 96:12,18 <b>access</b> 82:10,14 125:3,5 127:14,17 127:20 <b>account</b> 58:25 59:3 61:4,6 63:1,10 64:17 65:1 66:8,15

66:17 68:16 69:9,13 70:4,16,17 81:15,17 81:23 82:25 83:4,5 83:8,10,11,14,15,19 83:20,23,25 84:1,8 84:12,13,15,16,16 84:20,25 85:18,22 85:23 86:9,14,18,22 87:4,19 88:3,5,5,9 88:18 89:10,15,25 90:6,9 105:15 106:2 127:5,15,17,20,23 127:24 131:10 142:4 <b>accounts</b> 57:2 69:22 81:13 105:2,7 126:14 142:3 <b>accumulation</b> 111:9 <b>accurate</b> 7:2 16:11 102:19 103:23 148:6 <b>acquired</b> 79:8 <b>act</b> 27:15 <b>action</b> 150:15 <b>active</b> 53:8 <b>activist</b> 47:4,8 101:1 135:7 <b>activists</b> 100:4 <b>activity</b> 115:2 <b>actual</b> 33:20 112:20 <b>added</b> 16:1 <b>additional</b> 146:5 <b>address</b> 60:23 62:21 82:12,17,19 85:14 86:25 87:4,8 89:11 89:13 125:7 138:20 <b>addressed</b> 15:5 87:19 88:4,5 138:9 138:16 139:7,8 142:3 <b>addressing</b> 131:21 <b>adjourned</b> 147:11 <b>administration</b> 79:20	<b>administrative</b> 76:5 <b>advance</b> 70:19 <b>advised</b> 125:19 <b>affiliated</b> 49:6 55:3 135:18 <b>affiliation</b> 49:9,16 <b>age</b> 79:3 145:4,24 <b>ago</b> 18:11 57:7,8 60:14 97:7 98:21 125:8,22 <b>agree</b> 15:10 75:20 <b>agreed</b> 5:3 <b>ahead</b> 99:23 106:4 124:23 <b>aid</b> 66:14 <b>al</b> 149:2 <b>allotted</b> 69:13 <b>allowed</b> 26:7 53:5 <b>amanda</b> 1:4 88:12 131:9,11,21 137:16 137:18 139:9 <b>america</b> 92:3 93:25 94:12,20 95:3 <b>american</b> 8:13 38:25 39:17 40:24 43:9,19,21,22,23,23 45:22 49:14,19 52:4 55:5 84:3 100:4,6 100:10 108:12 112:9,16,18,20 120:24 131:23 135:23 141:16 146:12 <b>americans</b> 12:16,23 13:9,16 15:7,10,20 16:11 30:2 31:11 35:17 39:4,5,12,15 41:6,13,13,15,18,25 42:5,13 45:6 46:6 46:11 63:21 66:1 71:18,24 91:10,13 92:9 94:3 96:4 97:13,17 98:7,25 100:9,16,21 108:16 110:21 111:3,6,10	112:11,14 113:4 114:12 115:12,17 115:24 116:3,5,10 116:16 117:2,7,18 117:24 118:3,8 119:7,13 122:16,19 130:14 135:1 140:11 141:11 146:24 147:6 <b>annenberg</b> 92:7 <b>answer</b> 16:18 24:2 46:20 51:15 64:5 79:12 105:10 106:4 115:15,21 116:1 124:20,21 128:15 132:21 137:9 144:24 <b>answered</b> 11:3 58:12 100:23 109:24 113:7 116:22 117:21 119:15 128:15 <b>answers</b> 138:7 <b>anten</b> 3:9 104:22 147:2,8 <b>anten's</b> 104:18 <b>anybody</b> 70:24 82:21 106:19 145:23 <b>anyone's</b> 106:23 <b>anyway</b> 90:18 <b>appeal</b> 1:2 <b>appears</b> 7:5 <b>application</b> 20:8 <b>applied</b> 18:19 20:3 <b>apply</b> 18:18 <b>approached</b> 77:3 <b>appropriate</b> 10:11 10:13 121:20 <b>approval</b> 9:11 10:25 <b>approved</b> 45:4 110:14 <b>approximately</b> 115:19	<b>area</b> 49:23 50:7 <b>art</b> 112:18 <b>article</b> 4:15 13:3,7 13:11,14,18 14:7,10 14:21 15:1,3,8 17:1 17:1 92:19 93:25 99:3,3,4,4,13 133:15 134:2 <b>articles</b> 120:16,19 <b>artistry's</b> 42:9 <b>asked</b> 11:2 16:14 24:5 58:11 91:16,17 100:7,22 106:11 107:1 109:23 116:21 117:5,12,13 117:20 119:14 121:16 128:14 136:21 137:6,19 143:3 <b>asking</b> 19:22 45:23 45:24 66:21,22 92:1 95:19 98:23 99:10 109:16 110:5 113:24 116:6,7 122:6 <b>assigned</b> 61:9 <b>assistant</b> 134:4,12 134:14,17 <b>assisted</b> 64:9,12,13 <b>assume</b> 29:25 72:6 <b>athletic</b> 115:2 <b>attempt</b> 142:9 <b>attend</b> 51:20,24 108:5 114:12 <b>attended</b> 79:22 <b>attending</b> 53:2 <b>attorney</b> 124:21,23 150:13 <b>attorneys</b> 5:4 90:4 106:15 <b>august</b> 22:25 23:10 23:13 60:19 62:18 70:5,5,9,10 81:20 126:11 131:13 133:21 140:8,8
--	---	---	---

<b>authority</b> 44:11 45:3 <b>authorized</b> 20:22 <b>automatically</b> 117:6 <b>avenue</b> 3:10 <b>aware</b> 33:15,17,17 34:2,6,14,17,23 35:17 36:19 68:19 75:20 76:3,13,15 81:4 86:17 91:9 92:1,5 93:15 94:18 94:24 97:22 98:4 100:20 105:14,16 119:22 124:10 125:24 136:3 <b>awareness</b> 35:6,10	<b>behalf</b> 1:15 5:6 93:14 <b>belief</b> 106:13 <b>beliefs</b> 31:22 <b>believe</b> 13:2 15:3 16:6 28:23 47:7 49:17,21 53:14 55:2 70:18 76:4 77:17 83:7 91:12 92:13,16 93:17,19 94:2 99:6 99:12 118:6 139:5 139:15 <b>believed</b> 140:9 <b>belong</b> 146:14 <b>bentley</b> 1:5 65:17 131:11,15,20 132:9 132:12 <b>best</b> 58:10 91:7 101:25 102:19 103:24 104:15,18 <b>bet</b> 23:23 <b>beyond</b> 126:25 <b>biddle</b> 3:4 <b>big</b> 30:5 77:15 <b>bill</b> 145:13 <b>binder</b> 51:1 <b>birth</b> 146:21 <b>birthday's</b> 23:10 <b>bit</b> 53:17 107:22 132:3 <b>blackhorse</b> 1:4 65:9 87:25 88:12 89:2 107:19 131:9,11,21 132:10 136:10 137:13,15,16,18 138:9 139:9,9 149:2 <b>blackhorse's</b> 131:10 <b>blood</b> 8:13 <b>bloodlines</b> 8:8 50:3 <b>board</b> 1:2 49:12 54:12 55:1,2 120:2 120:20 145:11 <b>body</b> 140:22 <b>bond</b> 114:23 117:1 117:17	<b>bonnets</b> 112:12 <b>book</b> 51:1 <b>born</b> 74:24 118:16 118:20 119:1 <b>bother</b> 78:15,21 96:5 111:1,2 112:21 112:25 129:3 130:5 131:5 132:3 <b>bothered</b> 10:7 42:25 43:3,5,7 <b>bothers</b> 110:24 111:10 113:14 129:23 132:4 <b>box</b> 66:19,25 68:4 69:13,18,19 84:11 <b>boxes</b> 84:11 <b>branded</b> 72:12 <b>brave</b> 115:7 119:10 <b>break</b> 50:12 61:21 61:22 62:1 95:6 101:3,5 133:2,5,7 <b>breakfast</b> 18:6 <b>brief</b> 55:14 <b>briggs</b> 1:4 65:13 123:18,19 124:9,15 125:1,11,17 126:3,6 126:21 127:4 128:10 <b>bring</b> 141:10 <b>bringing</b> 10:17 <b>broadway</b> 150:12 <b>brother</b> 28:6 29:16 30:6 32:4,13,18,24 36:25 108:1,8 109:4 109:16,17 <b>brother's</b> 28:16 <b>brothers</b> 28:19,20 28:21,22 29:13 30:13 31:5,9,24 32:12,18,23 <b>brought</b> 121:16 <b>bunch</b> 17:13 <b>business</b> 10:18 <b>busy</b> 55:15	<b>button</b> 107:8 <b>c</b> <b>c</b> 3:1 135:14 150:1,1 <b>cabinets</b> 67:6 <b>caddo</b> 50:1 <b>calculation</b> 115:20 <b>call</b> 48:3,4 83:20 96:13,18 107:3,8 136:8 <b>called</b> 21:5 38:3,8 40:1 47:12 48:4,20 48:24 58:25 73:17 78:17 80:6,9 82:12 118:20 136:2 <b>calling</b> 103:5 <b>calls</b> 144:23 <b>cancel</b> 45:11,13 46:4 46:23 91:11 98:20 141:11 <b>cancellation</b> 1:8 92:25 94:1 <b>capacity</b> 12:5 <b>capitol</b> 38:11,12,20 38:20,25 39:13 40:11,12 41:5 42:17 73:10,11,11,15,17 74:8 75:3 80:3,5,6,9 134:4,8,11,18,18 <b>caption</b> 1:11 2:1 <b>car</b> 14:3,4 <b>card</b> 4:9 7:6 18:12 18:25 19:2,7,8,9,17 19:22,25 20:1,2,5,6 20:9,14,22 21:8 <b>care</b> 77:19 <b>cares</b> 77:17 <b>caricature</b> 40:23 <b>carnegie</b> 21:12 <b>case</b> 10:2,9 11:22 13:11,15 33:9,10,11 33:16,20,23 34:3,7 34:8,9,10,11,12,14 47:17 53:18 54:17 55:18,21,22,25 56:3
---	--	--	---

56:15,20,20 57:6,11 57:16 58:5,15 60:12 60:16 61:13 63:19 67:8 68:20 69:3,4,5 69:6 70:10 81:6 84:21,23 85:20 90:2 90:3 105:8 106:2,20 124:9,12,16 125:2 126:10,11,24 132:10,13,15 137:4 140:18 142:22 <b>cases</b> 89:2 <b>catch</b> 27:18 <b>caused</b> 51:8 68:15 <b>causes</b> 70:19 <b>cell</b> 48:19 <b>center</b> 27:21 <b>century</b> 59:7 <b>ceremonies</b> 130:15 <b>certain</b> 9:19 68:1 <b>certainly</b> 104:13 <b>certificate</b> 148:1 <b>certificates</b> 121:25 122:7 <b>certified</b> 5:8 150:4 150:20 <b>certify</b> 150:5 <b>change</b> 75:13,15 121:18 <b>changed</b> 28:24 82:12 139:2 <b>changes</b> 148:5 <b>characters</b> 100:12 <b>chebon</b> 135:10,12 <b>check</b> 60:2,5 77:21 <b>checked</b> 60:6,11 <b>chief</b> 115:7 119:10 <b>chiefs</b> 24:19,20,24 <b>chose</b> 53:6 <b>church</b> 49:5,7,11 51:18,20,24 52:2,4 52:9,10,13,16,17 135:18,19 <b>circumstance</b> 33:14	<b>circumstances</b> 53:13 122:15 <b>cited</b> 13:3 <b>citing</b> 15:6 <b>city</b> 1:16 5:7 14:1 81:22 150:12 <b>civics</b> 79:18 <b>civil</b> 5:10 <b>claim</b> 12:10 13:16 15:10 35:16 <b>claims</b> 8:25 9:5,8,11 10:9,25 <b>clark</b> 52:15 <b>classmate</b> 135:21 <b>clear</b> 35:12 40:10 48:23 54:10 58:9 119:5 <b>clearly</b> 88:17 <b>client</b> 85:20 <b>close</b> 23:14 <b>closed</b> 81:23 <b>cloud</b> 123:18,19 124:9,15 125:1,11 125:17 126:3,6,21 127:4 128:10 <b>clouds</b> 123:17 <b>club</b> 145:21 <b>coach</b> 79:14 <b>coco</b> 59:1 62:20 65:1 70:17 86:1 138:20 <b>coffee</b> 17:25 <b>coined</b> 43:22 <b>colleague</b> 86:24 <b>colleagues</b> 50:7 76:5 <b>college</b> 27:2,2 32:15 32:22,25 44:5,13,19 45:3 48:10,14 59:17 79:24 81:17 83:19 83:20 84:3,15,16 100:8 111:25 125:5 138:18 139:1 <b>column</b> 92:15 <b>come</b> 25:21 31:13,20 61:15 68:5 94:19 120:24	<b>comes</b> 94:25 115:1 <b>comfortable</b> 41:24 <b>coming</b> 82:23 <b>commission</b> 34:2 49:4,13 54:13 148:20 <b>committee</b> 50:8,19 50:22 51:3,9 52:19 <b>committees</b> 53:8 <b>communication</b> 107:4 124:21,22 126:24 127:3,11 145:9 <b>communications</b> 55:10 64:5,6 84:6 <b>competing</b> 36:16 <b>competition</b> 113:1 <b>complain</b> 119:17 <b>complained</b> 119:24 <b>compound</b> 50:24 99:5 139:14 <b>conceive</b> 129:12,17 <b>concern</b> 41:8,21 <b>concerned</b> 69:6 122:14 <b>concerning</b> 21:20 <b>concludes</b> 15:8 <b>conclusion</b> 144:24 <b>concur</b> 115:9 119:11 <b>conditioned</b> 132:6 <b>conduct</b> 67:11 <b>conducted</b> 64:25 91:21 92:8 93:14 97:5,6 <b>conducting</b> 66:14 <b>confirmation</b> 53:19 <b>connection</b> 12:10 53:12 85:18 124:9 <b>consider</b> 89:6 101:1 121:15,18 146:22 147:1 <b>considering</b> 75:9 <b>consist</b> 8:18 <b>consistent</b> 31:4	<b>contact</b> 10:24 47:10 47:15 53:20 85:25 93:5 125:11 127:10 <b>contacted</b> 46:22 141:15 <b>contacts</b> 127:12 <b>contained</b> 69:14 <b>context</b> 64:10 116:11 131:6,25 132:18 <b>continue</b> 112:11 <b>continued</b> 2:1 120:25 <b>continues</b> 1:11 <b>convened</b> 76:13 120:3 <b>convenient</b> 61:20 <b>conversation</b> 31:13 122:23 128:19 131:4 <b>conversations</b> 128:12 <b>convey</b> 144:3 <b>copies</b> 125:16 <b>copy</b> 4:9 7:20 14:12 14:16 62:6 63:22 138:7,8 <b>correct</b> 7:2 11:8 35:6 42:24 56:23 59:5 103:8 105:8 107:16 119:13 137:9,17 150:9 <b>correction</b> 149:4 <b>corrections</b> 148:4 <b>correspond</b> 87:1 <b>counsel</b> 7:4 61:20 104:10 113:8 133:4 137:11 138:12 140:4 <b>county</b> 150:3 <b>couple</b> 13:13 17:7,8 18:25 19:2 36:1 52:11 55:17 60:13 77:22 146:9
---	---	--	--



<b>course</b> 36:14 37:20 <b>courses</b> 84:2 <b>court</b> 12:20 37:24 39:24 96:16 97:16 113:11 118:1 129:16 <b>courtney</b> 1:6,14 5:5 6:1 89:19 91:7 101:14 102:9 103:1 138:23 148:10 149:25 150:6 <b>courtneytstigh</b> 61:6 83:8,11 84:1 84:24 86:21 89:23 90:2 <b>cousin</b> 142:20 <b>cowboys</b> 25:1 109:7 109:11 <b>create</b> 114:22 116:25 117:17 <b>credit</b> 144:10 <b>criteria</b> 63:15 <b>cross</b> 4:4 146:10 <b>csr</b> 1:19 150:20 <b>ctstigh</b> 61:10 85:17 85:23 <b>ctstigh.stu</b> 61:4 81:15 83:10 <b>curious</b> 31:8 <b>customs</b> 130:16	<b>dated</b> 88:20 101:12 102:12 103:7 131:12 133:21 136:16,25 <b>dates</b> 22:18,19 <b>daughter</b> 28:21 <b>day</b> 17:3,10,10,10 17:16,16,17 20:11 20:12 40:7 48:21,22 48:25 49:1 133:23 141:1 148:13 150:17 <b>days</b> 23:6 68:2,2,2 141:5 <b>deal</b> 10:19 77:15 <b>dealing</b> 90:1 91:2 <b>december</b> 82:2 <b>decide</b> 121:17 124:17,25 <b>decided</b> 121:18 128:3 <b>decision</b> 12:1 <b>deem</b> 7:12 16:10 <b>defendant's</b> 133:8 <b>definitely</b> 28:1 <b>degree</b> 8:10,11 <b>delaware</b> 50:1 <b>delete</b> 68:16 81:10 82:13 90:18 107:13 107:16,18 <b>deleted</b> 57:16 67:21 67:23 68:7,14,19 69:8 70:9 81:6,7 83:17 84:12 85:6 88:19,25 89:2 105:6 106:1 139:10,19 144:18 <b>deleting</b> 69:17 106:5 <b>demonstrate</b> 12:7 <b>depiction</b> 37:19 <b>deponent</b> 148:1 <b>deposes</b> 6:3 <b>deposition</b> 1:14 5:5 6:10,12 21:21 62:4 147:11 148:4 150:8	150:11 <b>derogatory</b> 42:4 115:11 146:23 147:5 <b>descendent</b> 8:12 <b>describe</b> 41:4 <b>design</b> 2:7,10 <b>designated</b> 67:8 89:11 <b>designation</b> 31:10 <b>detail</b> 53:18 <b>determine</b> 124:15 <b>determining</b> 121:19 <b>develop</b> 36:14 <b>diaz</b> 46:25 <b>die</b> 115:6 119:9 <b>difference</b> 44:22 <b>different</b> 16:5,5 34:25 36:11,11,17 38:7 63:18 64:9 70:25 82:7,11,16,16 89:11 111:9 131:24 <b>differently</b> 100:7 <b>dinner</b> 56:12 <b>direct</b> 4:3 6:5 146:7 146:9 <b>directions</b> 115:1 <b>directly</b> 53:22,24 115:24 <b>discarded</b> 83:6 <b>disciplines</b> 115:3 <b>disclose</b> 16:15 <b>discuss</b> 55:18,21 69:22,22 76:13,25 120:3 <b>discussed</b> 13:7 22:12 30:10,19 31:17 70:22 76:16 76:20 105:1,5 <b>discussing</b> 56:3 <b>discussion</b> 56:19 71:25 <b>discussions</b> 56:15 77:10,12	<b>disparage</b> 35:16 45:5 46:6,10 117:1 122:19 <b>disparaged</b> 30:1 41:6 106:13 140:10 145:20 <b>disparages</b> 31:11 94:3 115:17 116:2,4 116:15 117:6,18 118:7,25 119:7,12 122:16 <b>disparaging</b> 36:18 37:15 42:4 71:2 116:10 117:11,24 118:3 129:13,18 135:1 <b>district</b> 120:24 <b>district's</b> 120:25 <b>diverse</b> 39:1,2 <b>document</b> 7:5,11,23 62:3 66:11 68:3,9 68:13 88:18 95:20 95:22,25 101:16 123:7 128:21 133:12 141:20 <b>documents</b> 58:14 61:12 63:11,16 66:7 86:18 88:22 101:16 102:11 105:1 122:3 125:23 138:25 146:5 <b>doing</b> 10:4 21:13 32:10 55:12 70:19 76:9 126:24 <b>drafts</b> 66:20 67:4 <b>draw</b> 77:21 <b>drawing</b> 40:22 78:16 112:19 <b>draws</b> 74:14 <b>drew</b> 74:10 <b>drinker</b> 3:4 <b>drive</b> 48:7 <b>duly</b> 6:2 150:6 <b>duplicate</b> 89:18,22
<b>d</b> <b>d</b> 4:1 <b>d.c.</b> 3:5 <b>daily</b> 4:15 14:8 16:22,23 17:15 69:2 91:19 92:14 133:16 <b>dallas</b> 25:1 <b>data</b> 16:1,15 <b>database</b> 64:16 <b>date</b> 16:25 19:3,7,12 19:13 22:25 47:21 68:1 97:9,10 103:15 149:3,25			

<b>duty</b> 125:24	<b>education</b> 120:3,21	113:3 126:20	126:23 143:10
<b>e</b>	<b>effect</b> 12:1	<b>exception</b> 90:4	<b>fan</b> 23:23,25 24:5,7
<b>e</b> 3:1,1 4:1,10,16	<b>eight</b> 29:20 108:10	<b>exchange</b> 124:3	24:8,9,13,15,19,24
13:24 50:25 53:25	108:11	<b>exchanges</b> 128:10	27:8,16 28:22,23
54:1,2,2,3,25 56:23	<b>eighth</b> 35:21 36:3	<b>exchanging</b> 126:5	32:4,5,7,19 109:7,9
56:25 57:2,5,11,14	<b>either</b> 30:20,21	<b>executive</b> 49:12	109:12
57:23,25 58:4 59:25	52:15 54:6 67:13	<b>exhibit</b> 7:8 19:6	<b>fandom</b> 27:11
60:4,7,8,22 61:12	90:9 110:10 111:8	62:5,11 87:10,13	<b>fans</b> 31:24 32:15
62:15,20 63:1,10,13	111:23 119:25	90:5 95:16,16,17	<b>fantastic</b> 7:19
64:10 66:7,15,17	124:8 138:23	101:6 102:2,7,21,25	<b>far</b> 14:1 19:16 42:10
68:1,4,16,22,23	139:23,25	103:10,12 107:19	58:22 76:12 92:9
69:9,15,17,21 70:4	<b>else's</b> 128:22	113:17 133:8 139:9	100:7 101:22,23
70:15 71:5,8 81:5	<b>emanuel</b> 3:10	141:22	104:2,3 105:17,21
81:10 82:16,19,25	<b>employ</b> 63:11 65:3	<b>exhibits</b> 4:7	121:4,8 122:14
83:4,5,9,22 84:19	<b>employed</b> 63:16,23	<b>exist</b> 120:23	<b>father</b> 8:12 11:14,18
85:14,22 86:20,25	66:7 73:3,8,22,24	<b>existence</b> 52:22	24:13 25:11 30:24
87:3,8,15,17 88:24	74:2,8,12 75:3,5	<b>experience</b> 56:3	49:22 72:21 73:21
89:3,5,7,11,12,13	<b>endorse</b> 10:25	<b>expire</b> 68:1	73:22 76:19 77:25
90:1,15,20,23,23,24	<b>engagement</b> 55:12	<b>expires</b> 148:20	79:2 80:10,24
90:25 105:2,7,14,18	<b>engaging</b> 71:25	<b>explanation</b> 93:6	109:11 121:13
105:22 106:1,7,9,19	<b>enjoy</b> 27:11,13	95:23 105:25	134:3,8,10
106:23,25 107:6,11	<b>enrolled</b> 7:25 33:2	139:20	<b>father's</b> 29:7,8
107:13,16 123:3	49:18 82:15	<b>expressed</b> 26:10	76:14 107:25 108:1
124:3,4,5,7,12,13,14	<b>enrollment</b> 20:14,20	31:20 76:4	121:4
124:25 125:3,4,5,6	20:23	<b>extent</b> 41:8 64:4,5	<b>favorable</b> 94:8,11
126:6,14,22 127:5	<b>entire</b> 67:13	124:20 145:9	<b>favorite</b> 24:17,22
127:10,13 131:10	<b>errata</b> 148:5	<b>extra</b> 7:20	28:16,16
131:10,12,12,14	<b>espn</b> 27:18,20	<b>extracurricular</b>	<b>february</b> 2:6,13
135:14,14,14	<b>essentially</b> 92:2	115:2	<b>federal</b> 5:9 45:9
136:23 137:15	<b>et</b> 149:2	<b>f</b>	98:19 121:24
138:9 139:6,11,11	<b>european</b> 8:19	<b>f</b> 150:1	<b>feel</b> 97:23 103:5
139:16,23 142:1	<b>event</b> 55:4	<b>fabricated</b> 16:7,8	117:11,23 118:2
143:8 144:9,12,13	<b>events</b> 79:22,23,24	<b>face</b> 56:19,19,21,21	130:16
144:15,18 145:7	79:24 80:12,13	<b>facebook</b> 128:22	<b>feelings</b> 76:4
149:1,1,1 150:1,1	<b>eventually</b> 83:5	<b>fact</b> 76:20 121:15	<b>fellow</b> 95:1 131:3,4
<b>eager</b> 115:8 119:11	<b>everlasting</b> 114:22	132:4	<b>fellow's</b> 135:11
<b>earlier</b> 20:1,1 27:9	117:1,17	<b>factor</b> 121:19	<b>felt</b> 134:24
47:13 134:7	<b>exact</b> 22:25 71:22	<b>fair</b> 6:23 7:1 102:18	<b>female</b> 47:1
<b>earliest</b> 70:3	<b>exactly</b> 27:11 36:7	103:23 143:11	<b>field</b> 28:3 37:24
<b>ec421</b> 59:1 61:7,11	56:13 86:7 97:24,25	<b>false</b> 104:4,6,7	67:12,14 112:25
65:1 70:17 86:1	98:12	<b>familiar</b> 92:11	<b>fields</b> 66:17
142:4	<b>examination</b> 4:3,4	140:13	<b>fight</b> 134:3
<b>educated</b> 44:22	6:5 146:10	<b>family</b> 8:23 18:19	<b>figure</b> 95:2
	<b>example</b> 22:23,24	49:24 53:7 91:3	<b>file</b> 12:2 20:23 21:1
	44:2 65:6 106:12		46:2,11 67:6 80:11

141:5 <b>filed</b> 10:22 22:24 23:3,7,12,19 31:14 68:24 75:2 126:10 126:11 133:24 134:19 141:1 <b>filing</b> 31:21 75:9 76:22 137:1 140:25 <b>fill</b> 137:24 <b>filter</b> 89:3,4 <b>find</b> 63:10 91:23 145:22 <b>fine</b> 7:18 19:23 25:7 100:15 <b>finish</b> 32:16 46:8,9 <b>firm</b> 22:6 <b>first</b> 6:2,10,23 18:15 19:9,18 28:1 33:8 33:13 40:13 46:22 52:3 57:4 60:9 74:2 76:25 91:15 99:19 100:14 101:15 103:2,17 114:19 115:6 119:9 120:14 125:24 126:5 136:13 150:6 <b>firsthand</b> 15:22,23 <b>fit</b> 145:13 <b>five</b> 30:17 61:23 77:22 95:13 <b>flip</b> 116:12 <b>floor</b> 3:10 <b>florida</b> 44:2,5,19 110:12,14,16 112:7 112:8 <b>focus</b> 41:20 43:15 43:17 <b>focused</b> 43:2 <b>folder</b> 67:7,9,22 84:21 89:12 <b>folders</b> 84:11 <b>follow</b> 32:14,22 104:13,20 <b>followed</b> 144:8	<b>following</b> 119:6 <b>follows</b> 6:4 32:6,8,8 32:9 <b>food</b> 95:11 <b>football</b> 1:9 6:8 23:25 24:7,8,13 25:22 26:4,7,24 27:1,1,3,9,16 28:3,3 32:15,25 40:3 94:3 96:5 112:1 130:1,2 134:25 145:21 147:5 149:2 <b>foray</b> 6:24 <b>foregoing</b> 148:3 150:8 <b>formal</b> 50:22 56:16 <b>formally</b> 53:1 <b>forms</b> 127:11 <b>forth</b> 125:17 <b>forty</b> 95:13 <b>forum</b> 121:16 <b>forward</b> 120:25 <b>forwarded</b> 89:14 <b>found</b> 15:17 145:3 <b>foundation</b> 28:4 72:15 75:24 77:16 79:11 113:22 118:21 129:20 132:21 141:13 <b>founded</b> 118:13,16 <b>four</b> 26:15 28:17 51:25,25 57:1 77:22 81:12 <b>fourth</b> 35:21 <b>franchise</b> 140:14 <b>french</b> 8:22 <b>frequently</b> 51:23 84:10,17,17 <b>friend</b> 129:7 <b>friends</b> 70:16 71:8 86:4 123:24 125:18 <b>front</b> 40:18 113:6 137:13 <b>fully</b> 119:22	<b>function</b> 83:23 <b>further</b> 53:18 93:3 94:14 146:1,3,5 147:9 <b>furtherance</b> 76:1 <b>future</b> 115:9 119:12  <b>g</b> <b>gallery</b> 112:18 <b>game</b> 25:22 29:14 30:3 130:1,8,24 <b>games</b> 25:14 26:19 26:24 27:5 <b>gathering</b> 143:10 <b>general</b> 23:25 49:12 84:23 92:4 106:23 106:24 107:7 <b>generally</b> 15:20 105:6 <b>geographically</b> 121:5 <b>geography</b> 79:19 <b>german</b> 8:20 <b>getting</b> 10:25 33:9 37:22 87:17 <b>give</b> 8:8 21:16 22:23 78:9 82:16 105:23 126:20 136:20 146:8 <b>given</b> 6:11 <b>giving</b> 21:20 <b>gmail</b> 86:8,22,23 87:19 88:5 90:9 <b>gmail.com</b> 85:23 <b>go</b> 10:20 14:23 21:11 27:5 37:22 52:9,10,14 56:1 61:11 67:14 74:20 80:12,17 99:14,15 99:18,23 106:4 107:18 124:23 <b>goes</b> 70:5 126:25 <b>going</b> 29:16,25 47:24 48:9 62:3 64:3 69:17 82:24,25	91:23 95:15 98:1,1 109:4 124:19 126:23 127:20 145:11 146:8 <b>good</b> 6:7 50:13,14 <b>gotten</b> 89:21 <b>gover</b> 1:5 65:15 122:4,23 128:13,18 130:21 <b>grade</b> 35:21,22 36:4 39:22 59:5 <b>grades</b> 39:21 <b>graduate</b> 82:1 108:3 <b>graduated</b> 59:18 82:4,5,9 108:4 <b>graduation</b> 48:13 <b>grandmother</b> 107:24 <b>group</b> 12:8,8 54:15 55:7 56:12 110:22 110:23 114:22 115:1 116:25 117:16 <b>guess</b> 6:10 24:18 27:1 33:16,25 50:7 53:18 82:11 86:15 91:21 111:21 129:9 131:25 133:17,23 143:11 <b>guessing</b> 47:19,20 <b>guy</b> 21:25 109:7 135:10 <b>guys</b> 7:13 80:18  <b>h</b> <b>h</b> 135:14 149:1 <b>habit</b> 106:22,24 109:12 <b>half</b> 8:10,11 95:7 121:6 <b>hand</b> 33:17 150:17 <b>handed</b> 7:5 <b>hang</b> 146:2 <b>happened</b> 55:7
---	---	--	---

<p><b>harjo</b> 34:12,14 48:1 50:4 53:15,23 54:7 54:16,19 56:2,3,19 62:16 65:7 69:1 87:3,18 89:1 106:14 136:21 137:3,16,19 139:7,11,12 140:16 141:10,15 142:1,10 143:23 144:3,19 145:14 <b>harjo's</b> 145:4 <b>harmful</b> 91:12 <b>harris</b> 93:13 <b>haskell</b> 107:20 108:11,21 109:13 110:2 111:13,14,17 111:18 112:4,5,18 <b>haul</b> 67:23 <b>head</b> 10:3 23:24 24:1 40:19,20 65:4 85:3 98:21 105:9 123:2 <b>headdress</b> 40:24 41:2 <b>hear</b> 56:9 120:12,14 136:19 <b>heard</b> 11:24 58:2 92:7 97:1 120:6 132:7 <b>hearing</b> 57:23 <b>heated</b> 77:10,12 <b>held</b> 52:3 53:3 55:4 135:20 <b>hello</b> 55:9,13 <b>helmet</b> 111:12 <b>help</b> 78:12 <b>helped</b> 78:4 <b>hereto</b> 5:5 <b>hereunto</b> 150:16 <b>hey</b> 55:11 136:4 <b>hi</b> 126:23 <b>hierarchy</b> 11:7 <b>high</b> 38:21 48:10,13 51:5 59:19,20,23 72:18,22 73:14,21</p>	<p>73:25 74:3,5,7 75:3 76:2,14,21 78:16 79:23,25 100:7 114:1,2,3,4,4,13 120:2 121:4 134:4,8 134:11,18,19 <b>highland</b> 38:14,15 39:18 <b>highlights</b> 27:18,21 <b>hill</b> 38:11,12,20,20 38:25 39:13 40:11 40:12 41:5 42:17 73:10,11,11,15,17 74:8 75:3 80:3,5,6,9 134:4,8,11,19 <b>hispanic</b> 39:11 <b>historic</b> 112:22 <b>historically</b> 118:25 <b>history</b> 79:19 115:7 119:10 <b>hit</b> 63:4 107:7 <b>hoard</b> 17:22 18:1 89:5 90:20 <b>hoarding</b> 89:6 <b>hold</b> 46:9 57:5 112:11,14 <b>home</b> 25:7 78:5 <b>hope</b> 95:14 <b>hopefully</b> 95:7 <b>horrified</b> 42:24 <b>hotel</b> 22:11 <b>hour</b> 22:3 95:7 <b>hours</b> 121:6 <b>house</b> 13:19 14:22 17:4,12 18:5 26:2,7 26:18,25 29:5,10,12 37:1 109:2,5,21,21 <b>huh</b> 11:9 13:25 18:10 19:5 21:2 36:5 37:8 39:3 47:3 72:9 87:20 92:23 96:10 105:20 110:11 111:4 119:25 133:20,25 137:2 138:11</p>	<p><b>i</b> <b>idea</b> 33:8 57:10 64:8 <b>identification</b> 7:6,7 7:9 18:12 19:17 20:15 87:11,14 101:7 102:3,22 113:18 133:9 136:11 141:23 <b>identifies</b> 20:21 <b>identify</b> 141:21 <b>identifying</b> 144:10 <b>identity</b> 110:23 112:13 <b>illustrated</b> 93:14,15 93:22 <b>image</b> 41:18 <b>imagery</b> 112:23 <b>important</b> 120:22 <b>importantly</b> 104:17 <b>inaccurate</b> 101:22 <b>including</b> 27:24 36:17 106:12 <b>indefinite</b> 43:14,14 <b>independent</b> 94:19 <b>indian</b> 38:7 40:19 40:20 44:23 52:16 100:5,8,11 107:20 108:12 109:13 112:18 <b>indians</b> 44:23 107:20 110:4,9,10 <b>indicated</b> 13:8 <b>indication</b> 87:7 <b>indifferent</b> 32:2 <b>individuals</b> 12:9 <b>infant</b> 18:17 146:20 <b>info</b> 91:7 <b>information</b> 10:2 12:14,21 13:1 48:1 53:15,21 70:8 83:4 93:9 97:12,17 101:24 106:12 125:25 127:23 143:4 144:8</p>	<p><b>informed</b> 58:13 <b>initially</b> 54:12 <b>instruct</b> 124:19 <b>intent</b> 45:20,20 <b>interest</b> 120:23 <b>interested</b> 47:24 53:20 143:4 145:22 150:15 <b>interrogatories</b> 4:13 103:2,17 <b>interview</b> 133:15 <b>interviewed</b> 133:18 <b>introduced</b> 95:16 <b>investigate</b> 93:3 <b>involved</b> 6:17,21 84:3 <b>iowa</b> 74:19 <b>issue</b> 19:3,11,13 30:5 33:16 34:17,24 35:6,10,12,15,18 53:9 76:13 84:23 100:7 <b>issued</b> 18:13,15 19:7 19:17 20:1,12 <b>issues</b> 84:4 <b>issuing</b> 20:14,15 <b>item</b> 90:18 <b>items</b> 64:20 67:2 84:11 106:6 107:18</p> <p><b>j</b> <b>j</b> 3:4 <b>jacob</b> 11:15 30:25 65:20 135:4 142:13 142:18 144:21 <b>jacob's</b> 142:18 <b>january</b> 87:18 88:20 <b>jillian</b> 1:5 <b>jog</b> 28:6 <b>john</b> 134:3 <b>johnson</b> 1:19 5:8 150:4,20 <b>join</b> 51:9 142:22 <b>joining</b> 46:23</p>
--	---	---	---

<b>jokingly</b> 71:8 <b>jr</b> 144:21 <b>july</b> 2:4 19:3,14,17 21:13 47:16,16,17 47:18 101:12,13 103:8 <b>june</b> 2:8,11 <b>junior</b> 59:23	49:18,20 50:4,6 57:18 60:4,8 63:14 68:10 69:12,25 70:1 70:3,4,6,11,12 72:17 74:5 76:1 77:2 80:7,11,13,17 80:21,22,23,24 81:9 82:11 84:10 86:15 86:16 88:2,21 89:8 89:20 90:13 91:2,6 91:8,22 92:5,6 93:18 95:11 97:24 98:6,9,10,10,11,13 98:14,15,15,17 101:22,23 104:2,3 106:16,21 107:4,9 107:17,20,23,24 108:1,11,20 109:6 110:8 113:24 114:7 114:14 115:23 118:10,10,10,14 120:2,7 121:9,10,11 121:14 122:24 123:5,9 124:2 126:7 126:16,17 127:14 127:15,16 128:18 128:20 129:4,9,21 129:22 130:1,8,9,25 131:6,24,25 132:4,8 135:17,19 140:2 142:24 143:11,12 143:22,23 144:1,5 144:25 145:8,16 <b>knowing</b> 83:4 118:9 <b>knowledge</b> 11:20 58:3 101:25 102:19 103:24 104:15,19 <b>knowledgeable</b> 55:24 132:5 <b>known</b> 23:21 24:11 114:9 132:2	<b>lack</b> 72:14 129:19 132:20 <b>laid</b> 145:13 <b>late</b> 120:13 <b>latest</b> 18:2 <b>laugh</b> 131:16 <b>law</b> 22:6 <b>lawsuit</b> 6:17,20 <b>leadership</b> 10:16,16 <b>leading</b> 53:13 <b>learn</b> 33:8 36:7 57:5 144:21 <b>learned</b> 33:19,21 92:21 127:22 <b>ledger</b> 94:13 <b>lee</b> 52:15 64:13,14 64:15,17,18,20 <b>left</b> 21:25 82:3 101:12 <b>legal</b> 144:23 <b>letters</b> 2:14 <b>level</b> 79:5,7 <b>levels</b> 112:24 <b>license</b> 20:15 <b>life</b> 18:22 26:15 <b>likes</b> 25:1,2 32:25 <b>line</b> 128:23,24 129:1 129:6,8 130:24 149:4 <b>list</b> 66:6,10 <b>listen</b> 27:17 <b>literature</b> 50:23 <b>litigation</b> 6:25 <b>little</b> 23:15 53:17 59:7 95:10 103:6 107:22 132:3 143:19 <b>live</b> 82:19 124:1 <b>lived</b> 25:7 112:20 <b>living</b> 29:11 78:5,7 <b>llp</b> 3:4,10 <b>local</b> 27:19 <b>locate</b> 63:16 142:9 142:12	<b>located</b> 13:18 14:21 52:2 <b>location</b> 52:12 <b>logical</b> 139:20 <b>logo</b> 37:17 44:11 108:20,21 109:20 110:13,14,22,24 111:13,13,14,15,17 111:18,24 112:3,4,5 112:6,6,7,16,19 117:10,10 <b>logos</b> 112:15 <b>lone</b> 1:5 65:17 131:11,15,20 132:9 132:12 <b>long</b> 18:11 22:2 23:19 24:11,12 50:18 52:7 59:3 73:1,8 85:24 86:13 95:14 118:20 <b>longer</b> 72:24 82:19 95:10 132:13 <b>look</b> 40:18 62:9 66:7 67:25 68:21 101:9 102:5 115:13 117:14 145:12 <b>looked</b> 18:1 63:9 112:21 145:19 <b>looking</b> 64:8 137:10 141:15 <b>looks</b> 44:25 115:8 119:10 <b>lost</b> 18:13,25,25 19:2 138:24 <b>lot</b> 81:9,10 <b>loud</b> 24:3 131:16 <b>loved</b> 69:2 <b>loves</b> 122:18 <b>lunch</b> 18:8 95:8,14 101:5
<b>k</b> 3:5 135:14 146:17 <b>karen</b> 1:19 5:7 150:4,20 <b>keep</b> 57:19,23,24 58:4 103:5 120:4 <b>keeping</b> 50:12 88:22 <b>kept</b> 14:19,19,20 57:25 89:12 <b>kernell</b> 135:10,12 <b>kids</b> 26:15 <b>kind</b> 47:20 116:10 <b>kinds</b> 27:22 <b>kiowa</b> 8:1,2,3,4,6,10 8:11,12,24 9:5,11 9:14 10:3,3,7,8,13 10:24 11:11,21,24 33:3,4,5,5 49:19,22 74:16,18,19,21 146:15 <b>kitchen</b> 18:3 <b>knew</b> 23:4 36:21 40:4 78:16 82:23 87:7 96:2 127:19 140:18 144:25 <b>know</b> 8:23 9:2,4,4,8 9:19,22,24 10:6 17:23,24 19:8,16,22 19:24 23:10,20 24:22 25:6 26:14 30:8 31:9,12,14 32:1,6 37:16,18 39:8,10 40:6,20 44:8,9,15 45:16 46:1,2,3,13,18,21 47:18,25 49:2,17,17	<b>k</b> 3:5 135:14 146:17 <b>karen</b> 1:19 5:7 150:4,20 <b>keep</b> 57:19,23,24 58:4 103:5 120:4 <b>keeping</b> 50:12 88:22 <b>kept</b> 14:19,19,20 57:25 89:12 <b>kernell</b> 135:10,12 <b>kids</b> 26:15 <b>kind</b> 47:20 116:10 <b>kinds</b> 27:22 <b>kiowa</b> 8:1,2,3,4,6,10 8:11,12,24 9:5,11 9:14 10:3,3,7,8,13 10:24 11:11,21,24 33:3,4,5,5 49:19,22 74:16,18,19,21 146:15 <b>kitchen</b> 18:3 <b>knew</b> 23:4 36:21 40:4 78:16 82:23 87:7 96:2 127:19 140:18 144:25 <b>know</b> 8:23 9:2,4,4,8 9:19,22,24 10:6 17:23,24 19:8,16,22 19:24 23:10,20 24:22 25:6 26:14 30:8 31:9,12,14 32:1,6 37:16,18 39:8,10 40:6,20 44:8,9,15 45:16 46:1,2,3,13,18,21 47:18,25 49:2,17,17	<b>l</b> 3:9 5:1 135:14,14	<b>m</b> 13:24 <b>madison</b> 3:10





<b>n.w.</b> 3:5 <b>name</b> 6:7 16:20 34:4 38:6 42:22,25 43:11 44:19 45:2,4,12 73:9 75:13,16 76:3 82:16 83:1 85:24 86:3,3 120:5 135:11 144:3 145:21 <b>named</b> 40:4 135:10 150:6 <b>names</b> 9:22,24 10:6 10:14 36:12,17 37:11 65:5,25 66:11 <b>nation</b> 44:18 107:21 108:12 <b>nations</b> 109:13 111:13,14 112:18 <b>native</b> 8:13 12:16,23 13:9,15 15:7,10,20 16:11 30:1 31:11 35:17 38:25 39:4,4 39:12,15,17 40:23 41:6,12,13,14,18,25 42:4,12 43:9,19,21 43:22,23,23 45:5,22 46:6,10 49:14,18 55:5 63:21 66:1 71:18,23 84:3 91:10 91:12 92:3,9 93:25 94:3,12,20 95:3 96:4 97:13,17 98:7 98:24 100:4,6,9,10 100:16,21 108:12 108:16 110:21 111:3,6,10 112:9,10 112:13,16,17,20 113:3 114:12 115:12,17,24 116:2 116:4,10,15 117:1,6 117:18,24 118:3,8 119:7,12 120:23 122:16,19 130:14 131:23 135:1,23 140:10 141:11,16 146:12,24 147:5	<b>nature</b> 63:21 112:25 <b>near</b> 124:1 <b>necessarily</b> 33:16 44:14 78:24 107:18 110:25 129:9 <b>need</b> 21:8 41:4 46:17,19 133:2 <b>needed</b> 78:12 <b>negatively</b> 115:16 <b>never</b> 10:7 25:18,24 26:4,18 30:2,9 31:4 31:17,20 59:10 95:24 108:4 115:6 119:9,24 122:25 144:25 145:10 <b>new</b> 3:11,11 14:5 37:11 54:17 86:25 87:7 143:25 <b>news</b> 27:19 <b>newspaper</b> 13:3 14:7,9 15:1,4 16:21 16:23 17:9,15,24 <b>newspapers</b> 17:25 <b>nfl</b> 23:23 24:5,8,15 25:11 26:19,24 27:1 27:24 31:24 32:19 36:24 65:25 116:11 <b>nickname</b> 38:19 43:7,8 72:19,22 76:13,20 78:17 79:8 110:2 114:4 121:17 <b>nicknames</b> 100:5,8 100:12 <b>night</b> 48:21 <b>nine</b> 78:3 <b>ninth</b> 35:22 39:22 <b>nodded</b> 24:4 <b>nods</b> 24:1 85:3 105:9 <b>non</b> 39:4 126:13 <b>noon</b> 95:7 101:4 <b>nope</b> 39:10 42:7 68:11 138:19 <b>norman</b> 52:3,5	<b>north</b> 150:12 <b>notary</b> 148:17 <b>note</b> 120:22 <b>noted</b> 148:5 <b>notice</b> 69:16 <b>notified</b> 58:3 <b>november</b> 150:17 <b>number</b> 4:9,10,11 4:12,13,14,15,16 7:8,13 20:20,20,23 87:10 101:6 102:2 102:21 113:17 133:8 141:22,25 <b>numbers</b> 16:1,10 71:22 <b>numerous</b> 10:17	144:23 145:5 147:2 147:8 <b>objectionable</b> 110:13,15 <b>obligations</b> 53:7 <b>observe</b> 80:13 <b>obtain</b> 9:10 18:11 <b>obtained</b> 16:15 98:19 <b>obviously</b> 129:25 <b>occasion</b> 20:1 <b>occasionally</b> 78:11 123:23 <b>occasions</b> 71:21,23 <b>occurred</b> 127:4 <b>october</b> 1:17 5:7 57:9,9,15 58:15 81:25 149:3 150:11 <b>ocu</b> 61:10 <b>odd</b> 43:10 <b>offend</b> 131:19 <b>offenses</b> 15:6 <b>offensive</b> 96:13,19 111:17 129:1,6 130:13,13,17,19,22 130:23,24 131:2 <b>office</b> 1:1 150:17 <b>official</b> 9:17 <b>officials</b> 9:19 <b>oh</b> 65:24 137:18 <b>okay</b> 7:25 8:20,24 10:6,20 11:13 12:13 12:25 13:17,20 14:3 14:9,15,20,23 15:1 15:14 16:17,20,23 16:25 17:6,9,21,23 18:4,11,24 19:3,21 20:3,7,16 21:7,13 21:18 22:12,16,19 23:14 24:10 25:5 27:20 28:15 29:2,5 30:19 31:8,17 33:2 34:6 35:5,14,17,23 36:3 38:1,19 39:12 39:17,23 41:20,23
---	---	--	--

42:15,22 43:1,6 44:1,10,10,17,24 45:1,25 48:20 50:18 51:23 52:9,13 53:1 53:20 54:19 55:9,20 56:14,18 57:1,4,8 59:6 60:22,25 61:8 61:19 64:7,16,23 65:6 66:17,24,25 68:12,14,15 70:15 73:8 74:10,21 77:5 78:4 80:2,15 81:9 81:15,23 83:19 84:2 86:6,17 88:14,17 89:17 90:12 91:25 92:21 95:9 96:23 98:1 99:7,13 101:18 102:8 103:6 104:8 104:16,24 106:11 108:3,5,11 109:20 110:10,19 111:21 113:2,9,12,16 114:12 118:13 119:5 122:18,22 123:22 125:14 126:10,20 127:3 128:12 129:2 130:3 131:2,8 133:1,2,3 135:21 136:10,22 137:12,24 138:20 141:4 142:9 143:6 147:10 <b>okcu.edu</b> 61:4 81:15 82:18 <b>okcuedu</b> 61:10 <b>oklahoma</b> 1:16,16 5:7,7,9 8:1,2 13:21 14:1 16:24,25 21:12 52:5 72:18 81:22 83:14 142:4 146:15 150:2,3,5,12,13,21 <b>oklahoman</b> 4:15 14:8 16:22 18:7 69:3 91:19 92:15 133:16	<b>old</b> 25:8,9 29:3 35:3 35:25 36:6,21 37:18 37:21 56:6 78:25 83:5 86:4,5 103:6 111:16 120:10 143:15,19 144:22 145:8 <b>older</b> 29:16,18,20 30:15,17 36:1 108:9 <b>oldest</b> 32:13,18 <b>once</b> 14:5 15:9 52:1 52:14 53:19 60:2 107:12,15 <b>one's</b> 30:17 136:4 <b>ones</b> 18:2 65:21 66:1 66:2 <b>open</b> 81:19 82:3 <b>opened</b> 61:3,5 <b>opponents</b> 38:6 <b>opposed</b> 18:1 19:9 <b>opposition</b> 100:5 <b>order</b> 46:18 124:15 <b>organizations</b> 120:22 <b>originally</b> 18:14 <b>osu</b> 33:1 <b>ou</b> 32:24 85:11,23 <b>ou.edu.</b> 85:17 <b>outside</b> 26:18 116:7 <b>owns</b> 6:9	95:15,17 99:2 <b>paragraph</b> 99:18,20 114:19 115:16,22 116:2,6,7,15 119:8 134:2 <b>paraphernalia</b> 71:11,15,19,24 72:3 72:12 109:13 <b>parents</b> 13:19 14:22 17:4,12,18 18:5 25:8 109:5,21 <b>part</b> 7:9 29:9,11,12 37:13,14,15,16,25 38:1 87:11 95:5 101:7 102:3,22 113:18 133:9 141:23 <b>participate</b> 33:23 144:22 <b>participation</b> 56:20 <b>particular</b> 19:7 20:5 20:6,9 32:19 96:22 131:1 <b>parties</b> 5:4 94:20 150:14 <b>pass</b> 48:1,2 53:20 143:4 <b>passage</b> 115:19 <b>passed</b> 53:15,16 144:8 <b>pastor</b> 135:19 <b>patent</b> 1:1 <b>pawnee</b> 52:16 <b>pay</b> 78:4 <b>pending</b> 103:14 <b>penn</b> 92:11 <b>pennsylvania</b> 92:8 92:18,22 93:6 95:24 96:3 97:1 <b>people</b> 10:6 44:21 45:22 70:23 112:9 112:16 121:16 131:24 <b>percent</b> 96:3,12,13 96:18,18,23,24	100:9,10 108:15,15 <b>period</b> 23:5 60:10 67:22 84:18 <b>permission</b> 44:18 <b>person</b> 36:15 43:18 46:22 54:7,11,20,22 54:24 64:24,24 116:12 136:5 143:7 143:9 145:20 <b>personal</b> 12:5 56:8 56:11 69:23 70:25 134:3 <b>personally</b> 6:21 21:3 21:6 76:9 134:24 <b>persons</b> 30:23 63:19 69:24 141:16 145:13 <b>pertaining</b> 124:12 <b>petition</b> 8:25 9:6,9 9:12 10:22 11:11,22 11:25 15:21 22:14 22:25 23:3,7,11,19 30:20 31:15,21 45:12 46:23 47:21 47:24 53:13 68:24 69:23 70:19 75:2,9 75:15,19 80:11 91:11 92:3,10,10,25 94:21 121:20 123:8 126:25 133:16,23 134:19 137:1 140:25 141:1,5,11 143:25,25 <b>petitioner</b> 103:1 123:5 131:4 132:13 132:14,15 137:3 <b>petitioners</b> 1:7 3:3 84:7 86:25 95:1 106:15 123:14 131:3 132:10 141:6 <b>petitioning</b> 45:11 <b>philip</b> 48:2 53:16,17 65:24 <b>phillip</b> 1:5
--	--	---	---



<b>phone</b> 47:11 48:3,19 53:25 54:6 56:22,24 107:3,8 125:13,14 143:7 <b>photocopy</b> 7:5,6 <b>physically</b> 13:17 14:21 64:25 140:24 <b>pick</b> 21:9,11 107:8 <b>picked</b> 18:9 21:5 <b>picture</b> 40:15,19 41:10 55:8,11,16 114:21 115:6 116:12,25 117:16 119:8 <b>piece</b> 66:5 <b>place</b> 11:7 26:25 80:6 <b>places</b> 16:5 <b>plaintiff</b> 141:16 <b>play</b> 29:22 37:1,5 38:13 39:12,15,21 68:20 <b>played</b> 38:5,8,14 39:18 73:15 109:18 <b>player</b> 25:2 <b>playing</b> 28:2,8,9,12 28:14,15 29:1 36:8 36:15 37:12,23,24 39:24,25 40:6,11 42:16 73:21 <b>plays</b> 110:24 <b>please</b> 101:9 137:9 <b>plenty</b> 108:25 <b>point</b> 11:6 66:10 82:18 107:18 <b>poll</b> 15:9,16,16 16:9 16:14 91:18,20,24 92:7,14,14,22 93:7 93:10,14,16,22 97:21 98:5,24 99:1 99:14,14 100:3,16 100:21 <b>polls</b> 15:20 16:7 92:2	<b>populate</b> 108:18 <b>population</b> 100:6 110:20 112:1 <b>position</b> 10:14 53:3 94:8,11 <b>possibility</b> 54:17 <b>possible</b> 42:9 139:19 146:2 <b>possibly</b> 14:25 90:1 90:19 107:17 121:3 144:11 <b>posted</b> 96:8 <b>practice</b> 71:25 90:18 107:5 130:15 <b>practicing</b> 51:13,17 <b>precisely</b> 16:15 <b>precluded</b> 140:25 <b>predominantly</b> 39:10 <b>prefers</b> 26:9 <b>prescription</b> 145:13 <b>presence</b> 136:7 <b>present</b> 53:9 56:2 <b>presentation</b> 56:2,6 56:9,16 <b>presented</b> 21:3 92:19 <b>preserve</b> 58:14 69:9 83:3 84:19 125:24 127:25 128:5,9 <b>preserved</b> 84:22 126:2 <b>president</b> 120:20 <b>pretty</b> 23:14 70:22 84:17 <b>previous</b> 2:1 <b>previously</b> 62:4 122:4 <b>primary</b> 83:23 86:13 <b>principal</b> 72:21,24 73:1 75:12 76:22 80:10 134:4,9,11,13 134:15,17,18	<b>printout</b> 4:14 <b>prior</b> 33:18 34:11 49:2 70:9 122:7 136:25 <b>private</b> 128:19 <b>privileged</b> 64:4 <b>pro</b> 1:9 6:8 100:10 147:5 149:2 <b>probably</b> 10:18 17:20 18:3,8 20:11 20:18 23:21 25:12 26:15,22 28:5 29:3 29:15 30:5 32:1,2 33:12,19,20 35:19 47:16,16,17 48:5,22 51:25 52:8 53:25 54:12,14 56:11,13 57:7,17 59:4,15,15 59:22 60:13,15 61:5 68:14,18,20 69:11 69:14 70:14 81:14 81:25 86:5,19 87:2 87:9 88:22 90:22,25 108:6 109:19 110:1 114:14,15 120:15 121:6 124:6,12 125:6 126:7 127:11 143:9,13 144:17 <b>problem</b> 61:25 86:8 <b>procedure</b> 5:10 <b>proceed</b> 121:20 <b>proceeding</b> 6:14 <b>produce</b> 13:11 61:17 68:9 97:19,25 124:7 138:5 139:25 144:15 <b>produced</b> 14:7 68:12 85:4 104:22 105:1 124:16,18 <b>production</b> 4:11 60:16,18,19,19 63:17 70:4 85:19 90:6 101:10,15 102:6,10 105:21 146:4	<b>professional</b> 134:25 <b>professors</b> 85:25 <b>promote</b> 120:23 <b>pronunciation</b> 8:3 <b>proportions</b> 39:9 <b>propounded</b> 6:4 <b>protest</b> 120:25 <b>provide</b> 106:12 <b>public</b> 26:25 71:1 113:20,25 114:20 116:11 117:8 119:18 120:20 121:16 148:17 <b>pull</b> 117:13 <b>pulling</b> 114:22 116:25 117:16 <b>purposefully</b> 107:10 <b>purposes</b> 145:4 <b>pursuant</b> 5:9 <b>put</b> 10:1 67:21 84:20 115:20 117:10 <b>puts</b> 57:8
<b>q</b>			
<b>quadrenniums</b> 53:5 53:6 <b>question</b> 6:11 16:8,9 16:12,14,17 22:14 32:16 46:10,20 51:16 91:16 101:13 103:13 113:6,7 115:13,15,20 136:17 138:12 140:4 146:2 <b>questioned</b> 92:13 <b>questions</b> 6:3 37:21 37:22 50:11,16 136:21 137:6,9 138:8 146:1,4,6 147:9 <b>quickly</b> 61:11 <b>quiet</b> 81:1,2,3 <b>quinn</b> 3:10			

<b>quite</b> 23:22 33:18 <b>quoted</b> 120:21 <b>quotes</b> 69:2 <b>quoting</b> 69:1 133:17 <b>r</b> <b>r</b> 3:1 13:24 135:14 149:1,1 150:1 <b>race</b> 49:5,13 50:9,10 50:19 52:19 53:9 54:14 55:3 <b>racial</b> 110:23 <b>radio</b> 27:18 <b>rallying</b> 80:12 <b>raskopf</b> 3:9 4:3 6:6 6:8 7:11,15,19,22 9:3 11:5 12:25 18:24 19:13,21 21:7 21:19 23:11 24:4 26:17 27:15 28:11 30:9,15 31:3 32:3 34:4 39:8 40:10,17 41:3 42:8,15 43:6 44:4,8 45:15 46:9 46:17 47:7 50:8 51:2,11,15 54:10 58:13,19 61:22,25 62:2,8,9 64:11 72:8 72:17 75:25 76:19 77:14,19 78:4 79:1 79:14 87:13 91:17 93:13 94:7 95:6,9 95:13,15,21 96:7,15 96:22 97:21 99:7,10 100:1,15,20,25 101:3,9 102:5,24 103:10,15 104:9,14 104:17,25 105:13 106:8 109:17,25 113:9,12,20,24 116:23 117:25 118:4,22 119:17 124:24 127:12 128:17 129:22 132:14,22 133:1,6	133:11 134:14 137:8,12 138:13 139:17 140:5,7 141:9,14,25 145:2 145:12,25 147:10 <b>reach</b> 51:8 <b>reached</b> 48:18 <b>read</b> 12:18,19 13:8 14:18 15:25 18:9 91:18 92:12,20 93:19,24 94:10 96:15 97:15,23 99:8 99:11,19,24 100:1 100:13 102:16 113:9 117:25 120:16,19 133:12 148:3 <b>reading</b> 34:25,25 93:22 94:5 132:22 145:7 <b>really</b> 13:4 15:10 24:8 32:19 33:18 37:21 42:23,23 43:3 43:8,15 56:18 67:21 70:17,24 85:24 122:13 127:9 128:24 129:25 144:4,7 <b>reason</b> 16:6 26:10 88:11 130:5 143:22 143:24 149:4 <b>reath</b> 3:4 <b>recall</b> 13:2,4 33:14 54:5 58:22 87:16 93:17 105:24 106:5 106:6,8,17 126:9 127:8,9,9 128:16 144:2 145:15 <b>recalled</b> 10:17 <b>receive</b> 48:4 50:23 84:6 105:18 107:6 <b>received</b> 50:25 51:1 57:14 63:20 81:6 86:20,21 88:17 104:14,18 124:8	139:6,15 142:7 <b>receiving</b> 62:13 142:1 144:2 <b>recognize</b> 132:9 <b>recognized</b> 69:5 <b>recollection</b> 22:13 22:17 48:23 58:6,10 134:10,21 <b>recommend</b> 144:11 145:16 <b>recommended</b> 142:25 144:16 <b>record</b> 7:10 62:2 87:12 99:20 100:2 101:8 102:4,23 113:19 115:18 133:10 141:24 148:6 <b>recorded</b> 98:20 <b>recycled</b> 67:16 <b>redskin</b> 38:6 41:11 43:9,11,12,13,20 71:4,7 114:21 115:5 115:14 116:2,4,8,9 116:14,24 117:3,4 117:16,23 118:2,5 118:20 119:8 122:14 136:2,4,8 <b>redskinnettes</b> 2:3 <b>redskins</b> 2:5,7,9,12 2:14 6:9 9:7,9 11:1 12:2,15,22 23:20,22 24:12 28:2,14,22 29:1,22 30:1,20 31:10 34:20,23 35:16 36:17,22 37:5 37:17 38:3,8,12,20 38:20,21,23 39:13 39:24,25 40:1,4,7 40:11,12 41:5 42:17 44:1 45:10,11,20,21 45:24 46:23 57:12 58:5,15 63:19 65:25 71:2,10,14,19,24 72:3,11,11,19,23	73:17 74:8 75:10 76:14,22,23 78:17 79:9 80:1,3,5,10,18 91:11 93:1 94:1,3 96:4,12,17 97:14,18 98:8,18,25 106:14 110:18 111:6,12,15 111:16,17 112:6,6 113:3,12 114:5 119:19 120:4 121:1 121:21,24,25 122:19 128:19,23 128:23,25 129:1,6,7 129:12,17 130:4,10 130:11,13,17 131:22 134:25 140:10,14,20 141:12 146:23 147:4 <b>refer</b> 71:8 128:25 132:6 <b>reference</b> 116:8 <b>referring</b> 19:6 68:17 112:4,5,6,7 129:4,5 146:23 <b>refers</b> 99:13 <b>reflect</b> 115:18 <b>reflecting</b> 33:19 <b>refresh</b> 22:13 134:9 <b>refreshed</b> 22:17 23:1 134:22 <b>regards</b> 91:7 94:15 <b>registered</b> 2:4,6,8 2:11,13,14 <b>registrant</b> 1:10,15 3:8 5:6 <b>registration</b> 2:3,5,7 2:9,12,14 45:9,9 98:19 122:1,7 <b>registrations</b> 46:5 46:24 121:23,24 <b>regularly</b> 59:12,14 <b>rejected</b> 12:16,23 13:9
--	--	---	--

<b>rejecting</b> 13:16 <b>relate</b> 106:2 <b>related</b> 57:6,11,16 70:10 90:3 93:10 105:7 106:19 <b>relates</b> 81:6 <b>relating</b> 58:4,14 115:23 <b>relations</b> 50:9 <b>relationship</b> 49:3 <b>relative</b> 142:14,16 150:14 <b>release</b> 95:23 <b>relevance</b> 26:12 <b>relevant</b> 147:4 <b>religion</b> 49:4,13 50:10,11,19 52:19 53:9 54:14 55:3 <b>remember</b> 10:4 11:23 13:5,12,14 17:2,11 18:21 21:13 22:20,20,24 23:2 25:13,25 28:2,8,9 30:22 31:6 36:16,18 36:19 39:14 53:17 54:23 55:14 56:13 56:14,24,25 57:22 57:23 58:3,18,19,21 59:4 60:20 62:13,24 63:8 65:19,21,22 66:1,3,16 67:20 70:1,2 71:6,22 74:4 74:5 77:7,8 81:5,8 84:9 87:5,17,21,22 87:22,25 88:1,2,3 89:8 90:13,16 91:4 91:21 93:21,21,23 93:24 94:5,22 98:12 101:14,16 103:16 104:25 105:2 106:21 109:6 120:7 121:3 122:2,9,11,12 126:17,19 127:15 133:18 136:14,24 137:25 138:2,14,22	141:14,25 144:7 <b>remembered</b> 58:2 <b>reminded</b> 60:25 <b>rent</b> 78:5 <b>repeat</b> 96:14 129:15 <b>replace</b> 61:6 <b>replacement</b> 19:8 21:8 <b>replaces</b> 19:25 <b>replied</b> 106:18 <b>reply</b> 6:3 63:4 90:25 107:7 <b>replying</b> 106:22 <b>report</b> 16:4 <b>reported</b> 1:19 91:19 93:15,25 <b>reporter</b> 5:8 12:20 96:16 97:16 113:11 118:1 129:16 133:11 150:5,20 <b>reports</b> 96:23 <b>represent</b> 6:8 12:12 41:13,14,14 43:21 43:21 44:4 120:9 <b>representation</b> 42:4 44:20 45:22 111:25 112:1 <b>representative</b> 130:18 <b>represented</b> 37:25 42:14 43:18,25 112:2,14 113:1 145:22 <b>representing</b> 12:8 16:11 41:25 43:11 70:7 113:23 133:17 <b>represents</b> 16:9 44:5 110:20 <b>request</b> 4:11,12 63:17 85:19 101:10 101:15 102:6,10 <b>requested</b> 85:5 <b>requires</b> 107:6 <b>reside</b> 13:20	<b>resign</b> 53:1 <b>resigned</b> 52:24 <b>respect</b> 11:1 <b>respective</b> 5:4 <b>respond</b> 62:23,25 90:15 91:4,4 107:1 107:3,10 136:23 <b>responded</b> 63:1 90:17 91:5,6 100:9 107:11 139:10,19 <b>respondent's</b> 101:15 102:10 103:2 <b>responding</b> 106:25 <b>response</b> 4:11,12,13 101:10,14 102:6,9 103:1,7 107:6 143:5 <b>responses</b> 100:11 103:17,20 104:10 <b>responsive</b> 63:11,16 <b>result</b> 15:25 <b>results</b> 15:19 16:7 64:22,23 96:8,9,11 96:16,21 97:3 <b>reveal</b> 64:4,6 124:20 124:22 <b>reviewed</b> 101:18,19 103:20 <b>right</b> 7:4 8:9 9:14 10:13,21,23 11:6,17 11:18 12:11 13:9,10 14:21 15:12 16:3,18 17:13,14 18:20 19:14 22:1 23:11,14 23:16,18 24:5,25 25:13 27:22,23 28:18 30:3,5,6,12 31:1,4,5,6,22 32:20 32:21 34:21 35:2 36:10,13,22 37:2,3 37:6,7,10 38:21 40:1,2,4,5,10 41:3,9 41:17,21 42:18,20 43:3 44:13 45:15,20 45:23 46:18 47:8 50:16,17 51:8 52:13	52:20,21 54:4 56:1 56:5,6,17,22 57:12 57:13,16,19,20,21 57:25 58:7,8,22,23 58:24 59:10,12 60:18 62:16,21 63:2 65:1,4 66:21 67:20 68:3,5,7,8,23,24 69:3,10,15 70:13 72:8,12,19 73:12,13 73:18 74:15,17,25 75:13 76:17,23 77:22,23 78:13,17 78:21 79:14,22 80:5 80:7 81:12 82:8,18 82:20,22,24 83:1,2 85:6 86:8 87:8 90:7 90:18,21,24 93:1 94:8,9,14,24 95:4 96:1,7,9,25 97:20 97:22,22 98:23 100:25 101:1,24 102:19,24 103:21 104:6 105:5,13,25 107:13 108:16,21 109:11,22 111:7,19 112:22,23 113:14 113:21,25 114:5,10 114:15,17,18 116:16,19 118:17 118:20,22 120:11 122:16,20 123:7,10 125:9,10,23,25 126:11 127:13,17 127:18,21,25 128:7 128:17 129:3 130:20,21 131:1 132:16,19 133:18 134:13,23 135:6,7 136:21 137:5,6,16 137:20,21 138:3,21 139:3,4,17,21,24 140:1 141:2,6 142:7 145:17,18,23 146:8
--	---	---	---

<b>roach</b> 64:15,17,18 64:21 <b>road</b> 7:16 <b>robert</b> 3:9 6:8 <b>role</b> 9:16 50:21 <b>roll</b> 20:20 <b>room</b> 26:8 29:7,8,11 <b>rule</b> 26:6 106:23,24 107:7 <b>rules</b> 5:9 <b>running</b> 69:18	75:12,15 76:3,6,14 76:21 77:21 78:16 79:8,23,24,25 80:12 83:22,24 84:13,16 85:8,10 100:7 108:18 111:2 114:1 114:2,3,4,4,13,20 116:11 118:11,13 120:2 121:5,7,7 124:11 125:5,7 128:1 134:4,8,11,18 134:19 143:13,14 <b>schools</b> 72:22 113:21,23,25 117:8 119:18 120:20 <b>scott</b> 121:11 <b>seal</b> 128:23,24 129:7 150:17 <b>search</b> 16:18 63:13 63:14,15,22 64:22 64:23 65:3,6 66:6 66:18 67:11,11,14 67:15 68:5 85:18 <b>searched</b> 61:12 64:9 66:25 67:2,7,9,9 67:10 86:11 88:18 <b>searches</b> 63:18,19 64:25 66:14 88:24 <b>second</b> 4:12 99:14 99:15,18,19 102:10 114:19 134:1 <b>seconds</b> 115:19 <b>see</b> 37:16,17,18 56:6 65:5 71:23 72:2 88:6,9 99:16 101:11 102:12 103:3,7,15 112:15,15 114:19 114:20,23 115:3 118:4 121:1 131:16 134:5 137:18 139:5 141:20 <b>seeing</b> 27:21 28:2 88:1,2 89:8 90:13 101:14,16 103:16 138:2	<b>seek</b> 93:9 <b>seen</b> 12:13,20 13:1 15:19 16:4 26:19 41:15,24 55:6,15 62:10,11 71:13,14 71:18 87:14,15 95:17,20,22,24,25 96:1,8,11,16,21 99:3 108:23 121:23 122:5,6 136:7,11,15 137:21 <b>sees</b> 32:9 100:6 <b>semester</b> 82:13,15 <b>seminole</b> 44:18,20 44:21,23 110:13 112:7,8 <b>seminoles</b> 44:2,5,6 44:19,24 45:13,23 46:4,11 110:14,17 110:18 <b>send</b> 14:15 64:20 88:8 93:6 105:14 <b>sending</b> 106:6,9 138:14,17 <b>sends</b> 113:3 <b>sense</b> 110:25 <b>sent</b> 10:2 62:20 63:4 64:20,22,23 66:20 67:2,4 68:23 83:7 84:11 86:17 89:24 103:21 104:13 105:15,18,18,22 106:1,6,19 107:13 107:16,18 124:5,8 124:13 125:6,7,17 144:13,19 <b>sentence</b> 99:19 100:14 114:25 116:24,24 117:14 117:15,18 118:5 119:12 <b>separate</b> 67:22 117:22 118:1,6,9 <b>separately</b> 67:18,19 104:23	<b>september</b> 2:14 60:20,21,23 97:5,10 102:12 103:16,18 <b>served</b> 53:6 <b>server</b> 82:7 139:2 <b>servers</b> 82:6,10 <b>services</b> 134:25 <b>set</b> 103:2,17 112:15 150:16 <b>setting</b> 54:15 <b>seven</b> 108:8 <b>seventh</b> 35:22 39:22 59:5 <b>sew</b> 128:22,24 <b>shakes</b> 23:24 123:2 <b>she'll</b> 12:18 <b>sheet</b> 148:5 <b>short</b> 61:21 133:5 <b>shorthand</b> 5:8 150:4 150:20 <b>shortly</b> 74:24 <b>show</b> 7:22 15:20 20:13,16,16,19 62:3 87:13 95:15 99:2 107:19 122:3 124:14 131:8,8 136:10 141:20 <b>showed</b> 15:9 20:18 <b>showing</b> 108:20 <b>shquanebin</b> 1:5 131:11,14,19 <b>shut</b> 125:8 <b>si</b> 99:14 100:3 <b>siblings</b> 28:17 <b>side</b> 55:25 94:12 101:12 107:25 108:1 <b>sift</b> 60:7 <b>sign</b> 10:8 45:12 72:3 143:24 <b>signed</b> 123:7 <b>significance</b> 68:19 88:22 <b>significantly</b> 98:16
<b>s</b>			
<b>s</b> 3:1 5:1,1 149:1 <b>salary</b> 74:10,14 <b>sampling</b> 16:10 <b>sat</b> 34:1 49:4 52:19 <b>satisfy</b> 42:3 <b>save</b> 17:17,20,21,22 57:10 125:19,23 <b>saw</b> 13:18 16:21 37:4 42:16 101:19 102:14 136:13 144:9 <b>saying</b> 20:24 38:4,5 43:1 45:18,19 55:11 67:19 87:18 89:14 89:18,24 96:20 98:4 107:5 111:22,23,24 112:2 115:23 116:14 120:21 129:24 130:6,7,20 <b>says</b> 6:3 7:25 19:25 96:3,12,17 97:9 98:24 99:15 101:12 114:21,25 115:5 128:24 131:15 134:2 137:8 <b>scholastic</b> 115:2 <b>school</b> 35:19 38:21 38:25 39:1 48:10,13 48:14 51:5 53:7 59:19,20,23 67:9 72:18 73:3,9,14,22 73:25 74:3,6,7 75:3			

<b>single</b> 54:6 67:10 105:14,18 124:7 <b>sir</b> 9:15 12:6 81:16 102:1,15,17,20 103:4,5,22,25 105:4 108:14 <b>sisters</b> 28:19 <b>sit</b> 65:22 66:3 81:4 94:23 122:11 <b>sitting</b> 21:25 <b>situation</b> 42:24 95:11 <b>six</b> 136:20 <b>skins</b> 131:3,16,20,22 131:23 132:7 <b>smithsonian</b> 55:6 <b>society</b> 44:22 112:15 <b>somebody</b> 15:4 57:24 107:8 116:11 <b>somewhat</b> 69:4 <b>son</b> 91:1 142:18,19 <b>sonic</b> 48:7,18 <b>soon</b> 145:20 <b>sorry</b> 24:7 44:15 47:13 50:11 53:3 62:8 72:16 74:19 96:14 103:12,13 107:14 135:11 136:19 140:8 <b>sort</b> 107:4 <b>sought</b> 9:10 141:10 <b>sound</b> 70:13 140:22 <b>sounds</b> 92:11 <b>source</b> 15:17 115:14 <b>sources</b> 78:18 <b>southeastern</b> 131:16 131:20 <b>space</b> 68:21 69:9,12 69:18 <b>spam</b> 67:7 <b>spares</b> 26:15 <b>speak</b> 53:22 123:22 123:23 142:24 <b>speaking</b> 55:7,12	<b>special</b> 120:3 <b>specific</b> 43:15,18 95:20,22 105:22 116:8 <b>specifically</b> 13:14 31:7 106:10 126:9 <b>speeches</b> 80:15 <b>spell</b> 135:13 146:16 <b>spoke</b> 30:24 31:4 53:11,14,24 54:6,14 <b>spoken</b> 11:10,17,21 54:24 <b>sports</b> 15:5 27:21,22 36:8,11,16 37:12,23 79:15,22,23,24,24 93:14,15,22 100:10 111:11 112:25 113:4,5,11,13,13 <b>ss</b> 150:2 <b>stack</b> 17:25 <b>stamp</b> 7:13,16 <b>stamped</b> 7:12,12 <b>stand</b> 86:1 92:3 94:1 <b>standing</b> 117:14 <b>stands</b> 95:3 <b>start</b> 69:17 126:5 143:25 <b>started</b> 59:6 66:14 119:1 <b>starting</b> 48:14 54:17 <b>state</b> 5:8 20:19 74:19 112:7,8 121:8 150:2,5,12,21 <b>stated</b> 132:23 <b>statement</b> 121:2 <b>statements</b> 148:7 <b>states</b> 1:1 43:10 <b>station</b> 27:19 <b>status</b> 88:1 89:1 <b>stenotype</b> 150:8 <b>stephen</b> 3:4 21:24 <b>sticking</b> 116:19 <b>sticks</b> 98:16,21 <b>stipulated</b> 5:3	<b>stop</b> 59:14 86:6 100:8,11 <b>stopped</b> 53:2 60:11 <b>street</b> 3:5 <b>student</b> 48:8 51:5 <b>students</b> 120:24 <b>study</b> 96:24 97:1,5 <b>stuff</b> 128:2 <b>sturdy</b> 115:7 119:10 <b>stylized</b> 2:14 <b>suanne</b> 34:5 46:25 53:14,19 65:20 <b>subject</b> 87:22,24 89:9 90:13 105:5 106:7 146:1,3 <b>subjects</b> 79:17 <b>submit</b> 20:7 <b>submitted</b> 10:14 102:14 <b>subscribe</b> 148:6 <b>subscribed</b> 148:12 <b>subsequently</b> 73:24 <b>substantive</b> 56:14 <b>substitute</b> 7:15 <b>succeeding</b> 7:13 <b>sudden</b> 37:12 39:23 <b>sufficient</b> 132:17 <b>suggest</b> 91:10 100:21 <b>suggested</b> 12:14,21 33:22 63:25 94:11 <b>suggests</b> 13:1 92:9 94:20 100:3,16 <b>suing</b> 98:20 <b>suitable</b> 145:3 <b>sullivan</b> 3:10 <b>summary</b> 99:3 <b>summer</b> 48:16,17 <b>support</b> 8:24 9:5,7,8 9:11 11:25 15:21 72:4 78:12 91:10 92:10,10,24,25 94:21 <b>supported</b> 31:22 77:25 79:5	<b>supporting</b> 72:10 <b>supposed</b> 41:11 57:5 57:10,18 125:23 <b>sure</b> 7:14 9:22,24 15:19 24:2 32:1,17 46:7 49:18,25 50:3 50:15,18 61:22,24 67:25 69:7 70:21,22 86:16 105:10 108:7 117:9 127:15 133:6 139:18 143:14 <b>survey</b> 13:3,8 92:17 94:15 95:2,23 96:2 96:21,21,23 <b>surveys</b> 91:9 94:18 94:19 <b>suspended</b> 127:20 <b>suzan</b> 48:1 50:4 53:15,22 56:2,19 62:15 69:1 87:3,18 106:14 137:3,15,19 138:9,10 139:7 140:16 141:10,15 142:1,10 144:9,19 <b>switched</b> 82:6,7,10 <b>sworn</b> 6:2,24 10:1 148:12 150:7 <b>symbol</b> 42:13 43:23 44:12 <b>symbolic</b> 41:11,12 <b>symbolism</b> 111:11 <b>symbols</b> 100:12
<b>t</b>			
<b>t</b> 5:1,1 149:1,1 150:1 150:1 <b>table</b> 17:25 18:3,7 <b>take</b> 15:15 26:25 50:12 61:21,22 62:9 72:3 84:2 95:6 101:3,9 115:8 116:23 117:9 119:11 146:8 <b>taken</b> 1:15 5:6,9 13:4 15:16 16:1			

62:1 92:17 94:19 98:5 101:5 112:17 133:7 150:8,11 <b>takers</b> 16:14 <b>talk</b> 79:25 <b>talked</b> 53:17 54:11 55:22 122:25,25 123:10,13 <b>talking</b> 15:24 34:7 34:10,12 35:13,15 35:20,23 66:19 96:25 129:25 130:2 130:7,7,9,24 133:16 <b>taught</b> 79:18 <b>teach</b> 79:17 <b>teacher</b> 73:6 134:8 <b>teaching</b> 79:18 <b>team</b> 24:17,23 27:3 28:7,13,15,16,16 32:9,14,19 33:1 38:2,5,8,10,13,19 39:13,15,19,25 40:3 42:14 44:5 45:3 73:21 80:9,12 96:5 112:2 116:12 118:19 130:2 147:5 <b>teams</b> 28:7 32:22 36:11 72:18 79:15 100:8,11 <b>telecast</b> 30:2 <b>tell</b> 41:3 44:22 46:18 57:23 62:10 117:15 122:4 <b>telling</b> 19:23 50:2 69:1 110:5 <b>tells</b> 122:10 <b>ten</b> 61:23 <b>tendency</b> 92:24 <b>term</b> 43:20,22 71:1 94:2 96:4 97:13,18 98:7 119:18 130:11 131:22 134:24 140:10 146:22,23 147:3	<b>terms</b> 42:3 63:22 64:1 65:3 66:6,11 <b>testified</b> 6:14 <b>testify</b> 150:7 <b>testimony</b> 6:24 10:1 21:20 85:2 116:18 117:19 119:2,3,6,6 150:10 <b>text</b> 87:15 125:15,16 125:19 126:2 143:7 <b>thank</b> 104:8 <b>thanks</b> 91:7 <b>thereabouts</b> 21:14 21:15 29:23 54:13 <b>thing</b> 22:16 102:25 <b>things</b> 16:12 35:1 64:9 70:18 78:12 102:11 111:9 112:13 113:13 <b>think</b> 10:11,12 11:16 13:4 14:19,19 28:5,13 32:11,24,25 42:2,8,9,12 46:19 48:24 49:19,25 53:24 55:19 61:16 66:4 67:15,20,20 68:18 70:22 71:3 73:2 75:6,19 80:20 85:17 88:1 92:18 93:19 97:6 99:7 101:3 105:22 106:16,18 112:24 113:2 115:11,16,22 116:9 121:19 122:22,24 123:4 131:22,23 132:8 136:1,9,12 137:23 138:2 140:23 143:3 <b>thinking</b> 24:19 46:14 <b>third</b> 94:20 142:15 <b>thought</b> 31:9 41:6 41:12,17 89:10 97:13,18 98:25 104:12 145:2	<b>thoughts</b> 132:25 <b>three</b> 17:8 28:17,20 28:21 48:15 52:18 <b>throw</b> 17:15 <b>till</b> 60:13 82:4 88:22 88:23,23 91:2 <b>time</b> 10:19 11:1,6 18:15 19:9,18 21:16 23:6,7,22 24:12 26:23 28:1 33:18 36:9 40:13 42:10 48:6,8,21 49:11 51:6 53:12 54:6,9 54:23 56:9 57:4 60:1,5,8,9,10,10,11 67:22 68:18,24 73:23 75:8 76:25 77:3,3 78:1,9,10 82:4,13 83:24 106:6 107:12,12,15,15 109:14,14,21,21 115:19 120:10 126:14,15 127:1 136:13,15 138:18 139:8 141:9 145:25 146:6,20 <b>times</b> 10:17 16:5 17:13 19:1,2 25:10 108:25 <b>today</b> 12:4 14:13 21:20 22:4 94:23 122:8 <b>todd</b> 3:9 <b>told</b> 54:16 57:21,24 58:1,6,20,21,23 70:24 75:22 76:7 86:24 91:18,20 125:22 134:7,23 144:4 145:10 <b>top</b> 65:4 99:16 <b>topic</b> 29:25 <b>trademark</b> 1:1,2 106:14 <b>trademarks</b> 6:9 12:15,22	<b>traditional</b> 40:24 41:1 <b>traditions</b> 112:12 130:16 <b>transcribed</b> 150:9 <b>transcript</b> 148:3,6 150:10 <b>transferred</b> 127:24 <b>transition</b> 11:6 <b>trash</b> 67:9,16,18,18 67:19,21,24 <b>trial</b> 1:2 <b>tribal</b> 4:9 7:6 18:12 19:17 20:15 45:2 49:16 130:15 <b>tribe</b> 8:1,2,4,6,9,24 9:5,11,14,16,17,20 10:3,3,7,8,13,24 11:11,21,24 20:14 20:21 33:3,4,5,6 43:9,11,16,22,25 44:6,12 45:3,4,21 49:22 74:17,18,22 146:14,15,19 <b>tribes</b> 43:10 49:25 <b>tries</b> 116:12 <b>trouble</b> 129:8,11,16 <b>troubled</b> 42:20 <b>troubles</b> 40:12 <b>true</b> 37:19 150:9 <b>truth</b> 150:7 <b>truthful</b> 101:24 <b>try</b> 91:23 95:2,12 142:12 <b>trying</b> 12:7 28:6 68:21 <b>tsotigh</b> 1:6,14 4:7 5:5 6:1,7 7:8,20,23 11:15 19:6 62:3 65:20 87:10 89:19 101:6,11 102:2,21 113:17 134:2 135:4 138:23 141:22 142:13 146:12,22 148:10 149:25
--	--	---	--



150:6 <b>tsotigh's</b> 101:14 102:9 103:1 <b>tulsa</b> 4:14 114:2,3,3 <b>turn</b> 53:4 59:6,11 64:16,17 101:11 102:11 134:1 145:20 <b>turned</b> 23:2,6,10 59:10 140:7,9 141:1 143:16 <b>turning</b> 10:15 <b>tv</b> 25:11,17,19,21 26:1,4,9,16,16,24 28:25 29:5 36:25 37:5 80:25 <b>twin</b> 30:18 32:3 <b>two</b> 17:8 32:2 53:6 121:6 142:3 <b>type</b> 26:13 66:6 82:7 <b>types</b> 38:7	<b>undoubtedly</b> 109:20 <b>unilaterally</b> 124:25 <b>union</b> 4:14 113:20 113:23,25,25 114:2 114:3,3,13,20 117:8 119:18 120:2,20 121:4 <b>united</b> 1:1 43:10 49:5,6,10,11 51:18 52:4,15,16 100:5 <b>university</b> 81:22 82:25 83:14 92:8,11 92:17,21 93:5 95:24 96:2 107:21 108:12 108:13 109:13 110:3 111:13,14 112:19 126:13 127:4 142:4 <b>urquhart</b> 3:10 <b>usage</b> 132:2 <b>use</b> 15:5,7 45:2,4 59:12 64:1 69:21 85:22,22 86:9 100:5 106:13 116:1,8,9 119:18 120:25 122:14 130:10 131:1 147:3 <b>uses</b> 128:18 <b>usually</b> 17:15 52:10 78:19	<b>views</b> 11:22,25 12:15,22 13:8 31:21 69:22,23 72:4 95:3 98:7 <b>vikes</b> 29:22 <b>vikings</b> 25:2,3,3 28:14,23,25 37:1,5 109:8,9 <b>virtually</b> 100:4 108:15 <b>virtue</b> 146:4 <b>visited</b> 60:22 <b>vs</b> 1:8	129:14,19 132:12 132:20,24 133:2,4 134:12 137:7,10 138:12 139:13 140:4 141:7,13 144:23 145:5 146:7 146:11 147:3,9 <b>want</b> 7:22 19:24 30:25 31:12 32:17 46:1 50:12,15 58:9 61:22 67:25 75:7 80:11 90:20 107:19 115:15 116:13 119:2,5 <b>wanted</b> 14:24 31:9 50:18 69:8 100:13 121:17 <b>wants</b> 99:24 <b>war</b> 112:12 <b>ware</b> 34:5 46:25 53:11,14 54:16 65:20 <b>warrior</b> 115:6 119:9 <b>warriors</b> 110:9,10 <b>washington</b> 2:9,12 3:5 6:9 9:6,9 11:1 12:15,22 23:20,22 24:11 28:2,14 30:1 30:20 31:10 35:16 36:22 37:4,17 39:25 40:4,6 45:10 55:4 57:12 58:5,15 71:1 71:10,14,19,24 72:2 72:11,11 75:10 76:23 80:6 94:2 97:14,18 98:8,25 106:14 111:5,12,15 111:16,16 121:21 121:24,25 122:18 128:25 129:6 130:4 130:10,11,12 134:24 140:10,13 140:20 145:21 147:4
<b>u</b>	<b>u</b> 5:1 <b>uh</b> 11:9 13:25 18:10 19:5 21:2 36:5 37:8 39:3 47:3 72:9 87:20 92:23 96:10 105:20 110:11 111:4 133:20,25 137:2 138:11 <b>ultimately</b> 142:22 <b>uncle</b> 11:15 30:25 92:13 135:5 142:18 <b>undergrad</b> 61:10 <b>underneath</b> 131:12 131:14 <b>understand</b> 15:24 73:20 88:15,16 90:7 90:8,10 111:21 117:19 119:3 <b>understanding</b> 50:16 132:18 <b>undertaken</b> 95:2	<b>v</b>	<b>w</b>
	<b>v</b> 149:2 <b>vague</b> 27:12 51:14 72:5 76:18 77:11 78:2 91:14 109:15 129:14 <b>vagueness</b> 54:8 <b>various</b> 111:9 131:24 <b>verbally</b> 105:11 <b>verification</b> 104:9 <b>verify</b> 20:19 <b>view</b> 45:5 70:25 71:1 132:19	<b>w</b> 146:17 <b>waited</b> 141:4 <b>walk</b> 14:5 <b>walked</b> 18:6 <b>wall</b> 128:22 <b>wallace</b> 3:4 4:4 7:14 7:18,21 9:1 11:2 18:23 19:10,19 21:4 21:16 23:8 24:2 26:12 27:12 28:4 30:7,14 31:2,25 33:24 39:7 40:8,14 40:25 42:6,11 43:4 44:3,7 45:14 46:7 46:15 47:6 50:5,24 51:10,14 54:8 58:11 58:17 61:20,24 62:6 64:3 72:5,14 75:24 76:18 77:11,16 78:2 78:22 79:11 91:14 93:12 94:4 95:8,10 95:19 96:6 99:5,9 99:24 100:13,19,22 103:9,13 104:12,16 104:20,24 105:10 106:3 109:15,23 113:7,22 116:21 117:20 118:21 119:14 124:19 127:6 128:14	

<b>watch</b> 25:21,22 26:7 26:9,16 27:1,5,17 37:1,1	27:13 28:5 30:8 32:1 33:25 40:9,15 41:1 42:7,12 43:5 50:6,25 58:18 64:7 72:6,16 76:9 77:12 77:17 78:3,24 79:13 91:15 94:5 96:20 97:19 99:6 100:24 105:12 106:5 117:22 119:16 127:8 128:16 129:15,21 132:25 133:3 139:15 141:8 144:25 145:7 146:1 146:6 150:10,16	90:9 <b>yahoo.com</b> 59:1 61:6 83:11 90:2 <b>yahoo.com.</b> 83:8 86:21 89:23 <b>yeah</b> 17:8,19 19:13 20:10 21:10 24:12 27:25 29:24 30:9 32:9 34:9 36:23,25 42:19 48:9 52:15 58:18 66:4,23 69:5 69:11 77:24 78:14 79:4 81:2 82:6 84:14 88:7,10 94:7 94:16 95:9,21 110:1 114:16,24 115:4,10 116:20 134:14,16 135:8,17 136:18 138:4 140:8
<b>watched</b> 25:19 27:20	<b>word</b> 43:13,25 71:4 71:7 97:9,10 99:21 114:21 115:5 116:1 116:4,8,9,14,24 117:3,4,16,23 118:2 118:5,7 119:8 128:18 130:12,17 131:3	<b>year</b> 10:15 23:15 39:21 57:7,8 58:16 88:23 98:15 125:22 <b>years</b> 25:9,11 28:10 29:3,19,20 30:17 35:3,25 36:1,6,21 37:18,21 48:12 51:25 52:11,18 56:5 57:1 77:22,22 78:25 86:4,5 97:7 98:1,20 108:8,10,11 114:9 120:10
<b>watches</b> 25:17 26:4 32:10 80:25	<b>words</b> 35:16 131:20	<b>yep</b> 131:18
<b>watching</b> 25:11,13 26:16 28:7,25 29:13 29:21	<b>work</b> 48:5 50:23	<b>yesterday</b> 22:4,5,21
<b>way</b> 9:4 28:6 44:25 57:9,15 78:20 86:1 118:24 124:22 129:12,17 142:6 145:10	<b>worked</b> 78:20	<b>york</b> 3:11,11 14:5
<b>wear</b> 71:14,18,24	<b>working</b> 48:6,21 76:21	<b>young</b> 29:3
<b>wearing</b> 72:2,11 109:12	<b>world</b> 6:24 15:17	<b>younger</b> 29:17 30:16
<b>web</b> 15:18	<b>worn</b> 71:10	<b>youth</b> 55:4
<b>website</b> 4:14 113:21 114:20	<b>write</b> 66:5	
<b>week</b> 80:18	<b>writer</b> 92:15	
<b>weekday</b> 17:4,5,6	<b>writes</b> 15:8	
<b>weekend</b> 17:4	<b>written</b> 132:15	
<b>weeks</b> 13:13 17:7,8 17:8	<b>wrong</b> 8:3 15:11 103:11,11 113:3	
<b>went</b> 21:3 25:18 34:11 55:13,22,25 59:17 73:14 79:20 107:24 108:2 143:13	<b>wrote</b> 15:4 81:5 92:15 128:21 129:7	
<b>west</b> 38:14,15 39:18		
<b>whatsoever</b> 66:14 97:12,17		
<b>whereof</b> 150:16		
<b>white</b> 8:19		
<b>wide</b> 15:18		
<b>willing</b> 45:12		
<b>wit</b> 6:4		
<b>withdraw</b> 140:5		
<b>withdrawn</b> 75:25 124:24		
<b>witness</b> 6:20 9:2 11:4 12:24 19:11,20 21:5,18 23:9 26:13		